Bank of Macks Creek

PO Box 180 Macks Creek, MO 65786

November 20, 2009

Mr. Robert E. Feldman, Executive Secretary Attention: Comments Federal Deposit Insurance Corporation 550 17th Street NW Washington, DC 20429

Re: Proposed Guidance-Correspondent Concentration Risk

Dear Mr. Feldman,

This letter is being submitted as a response to the request for comment on the Proposed Guidance addressing Correspondent Concentration Risk. The Bank of Macks Creek is a community bank with approximately \$25 million located in Macks Creek, Missouri. For a number of reasons we rely heavily on the services and support provided to us by our banker's bank and other correspondent providers. These relationships are critical to our bank and have become so central to our daily operations that unnecessary disruptions to them would severely hurt our ability to effectively serve our customers.

We believe that the guidance is excessive and unnecessarily complex. The risk assessment process should encourage an appropriate balance of sound intuitive decision making without relying exclusively on rigid quantitative measures. Our bank has been able to successfully manage multiple correspondent relationships for years without this additional burden. Suddenly this doesn't seem to be good enough and we are now being confronted with another wave of excessive and complex regulatory burdens.

We also urge you to remove the loan participation language from the calculation or somehow clarify it.

The Bank of Macks Creek appreciates the opportunity to respond and hopes that you consider our comments before issuing your final guidance.

Sincerely,

Richard Beydler President/CEO

Bank of Macks Creek

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