From: Dentremont, Carole [mailto:rchapman@brkl.com]
Sent: Wednesday, September 20, 2006 2:24 PM
To: Comments
Subject: FHLBank Advances

This is to register our strong opposition to including FHLBank advances in the definition of volatile liabilities. We have been active users of advances for close to 30 years through a variety of economic cycles and interest rate environments, and have always found them to be a reliable, reasonably priced source of funds. Moreover, the use of FHLB term advances has been a major tool in our management of interest-rate risk.

Reclassifying FHLB Advances as a volatile component of a bank's balance sheet would work against the FDIC's laudable goal of charging higher rates for higher risk.

Sincerely,

Richard P. Chapman, Jr.

Chief Executive Officer

Brookline Bank