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October 5, 2006

**VIA ELECTRONIC SUBMISSION**

Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, N.W.  
Washington, DC 20429

RE: Industrial Loan Companies and Industrial Banks  
Request for Comments

Dear Mr. Feldman:

Wright Express Corporation and Wright Express Financial Services Corporation (collectively referred to herein as "Wright Express") appreciate the opportunity to submit comments concerning their respective ownership and operation of an industrial bank regulated by the Federal Deposit Insurance Corporation ("FDIC") and the Utah Department of Financial Institutions ("DFI"). Wright Express is a leading provider of payment processing and information management services to the United States and Canadian commercial and government vehicle fleet industry. Wright Express provides these services for approximately 295,000 commercial and government fleets, which collectively manage some 4.3 million vehicles.

Wright Express provides its fleet customers with an efficient payment method for their vehicle needs coupled with specialized reporting and fleet management tools to assist them in their fleet operations. Many fleet customers report that use of these tools translate into cost savings, resulting from efficiencies in managing their accounts and detecting purchases that are made outside of their company purchasing policies.

The efficient payment method referenced above is a charge card issued by Wright Express Corporation's wholly-owned industrial bank subsidiary, Wright Express Financial Services Corporation ("WEX FSC"). WEX FSC, chartered and domiciled in Utah, has been issuing commercial charge cards since 1998. Customer relationships are owned by WEX FSC and back-end services, including information technology, collection, marketing and customer services, are provided by Wright Express Corporation under the terms of a comprehensive Master Servicing Agreement with WEX FSC. By coupling the expertise that Wright Express Corporation has in the fleet industry with

WEX FSC's ability to provide cost-efficient credit to our customers, Wright Express has been able to develop and expand the range of our products and services to meet the specific and unique needs of our commercial customers in a way that standard consumer-based card programs simply cannot.

Over the last eight years, Wright Express has successfully and efficiently grown its business, expanded its product offerings and, in so doing, has provided additional opportunities for our customers to manage and contain their corporate charge card expenditures. The industrial bank charter enables Wright Express to operate in a unified, cost-effective manner throughout the United States. Rather than having to maintain specific lending licenses in all 50 states, Wright Express is able to operate uniformly in all states by adhering to federal and Utah banking laws. Further, WEX FSC has allowed Wright Express to expand our commercial credit operations to include the issuance of MasterCard® branded corporate charge cards. These cards are issued to businesses that rely on the web reporting tools and card payment choices as a more efficient method of managing their purchasing needs and streamlining employee expenses for items such as travel and entertainment purchases.

WEX FSC is highly rated, well capitalized, profitable and managed by a team of experienced and dedicated banking professionals in Salt Lake City, Utah, who are overseen by an independent and highly-qualified board of directors. WEX FSC is subject to the same safety and soundness, consumer protection, deposit insurance, Community Reinvestment Act, and other requirements as other FDIC-insured depository institutions and, accordingly, is subject to regular, extensive and intensive audit and review by both the FDIC and the DFI. Such audits include periodic reviews of the information technology and other services provided to WEX FSC by Wright Express Corporation, as well as Wright Express Corporation's business practices.

If WEX FSC did not exist, Wright Express Corporation would be required to either outsource its credit support operations or internalize such operations. Either option would be severely disruptive to Wright Express Corporation's business and would cause Wright Express Corporation to incur significant additional operational costs. If Wright Express Corporation were to outsource its credit support operations to another party, such party would likely not have the specialized expertise in the commercial fleet card market possessed by WEX FSC, which gives Wright Express a competitive advantage in the marketplace. If Wright Express Corporation were to internalize its credit support operations, we would be subjected to the credit laws of each individual state in which we do business. It is not difficult to imagine that the disruption and costs incurred by Wright Express Corporation would have detrimental effects on the hundreds of thousands of customers that rely on Wright Express' products and services to help manage their corporate spending.

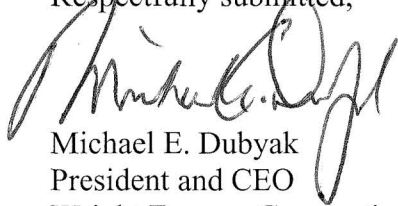
Wright Express' experience in owning and operating an industrial bank has demonstrated that the industrial bank: (a) provides a cost effective method to provide specialized services in niche markets; and (b) is highly regulated and its operations are carefully scrutinized by state and federal banking regulators. In Wright Express' experience that

scrutiny has extended well beyond the four walls of WEX FSC and into Wright Express Corporation, where the FDIC and DFI thoroughly examine the Master Servicing Agreement and other transactions between WEX FSC and Wright Express Corporation.

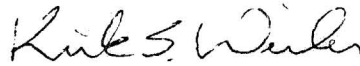
Wright Express' overall business has been very successful during the past several years as evidenced by our growth. We believe we have prudently and successfully managed that growth both at the parent and industrial bank levels. Imposing limits on WEX FSC, especially on growth, could substantially damage both Wright Express Corporation and WEX FSC. WEX FSC has no current plans to open any branch but the opportunity to expand offices could arise in the future. Wright Express firmly believes that limitations on growth, branching or other activities critical to the industrial bank would be unjustified given the record of safe and sound operations by WEX FSC and industrial banks generally.

Thank you for this opportunity to comment. Please do not hesitate to contact us if we can provide further assistance or information.

Respectfully submitted,



Michael E. Dubyak  
President and CEO  
Wright Express Corporation



Kirk S. Weiler  
President and CEO  
Wright Express Financial Services Corporation