



Our interest is in *you*.

March 22, 2006

Robert E. Feldman, Executive Secretary
Attn: Comments / Legal ESS
Federal Deposit Insurance Corporation
55 17th Street NW
Washington, DC 20429

Dear Mr. Feldman:

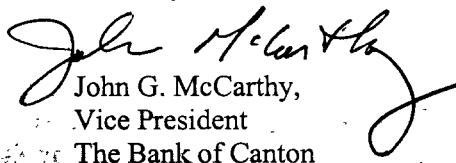
I am a commercial lending officer at Bank of Canton – a community bank based in Canton, Massachusetts. For over 170 years Bank of Canton has successfully served the evolving needs of its valued customers. During the past 20 years our bank has undergone tremendous growth, expanding from a single-location institution to a six branch, \$750,000 asset bank that strives to provide superior customer service to our growing customer base.

As a full service bank, we provide a full array of lending products, including C&I loans, commercial real estate loans, residential mortgage loans and consumer loans. The accessibility of these varied loan products is vitally important to our community, as it is to the overall strength of the American economy. Our team of lending officers possesses a great deal of experience in the arrangement of these loan products and, consequently, we are deeply concerned about the arbitrary and mechanical nature of the newly proposed regulations concerning bank concentrations in construction and/or commercial real estate loan exposures. We believe that the proposed threshold tests are inappropriate as they do not recognize the inherently different risk levels attached to the different real estate loans arranged by our bank, e.g. loans for contractor spec home development, commercial construction loans, land development loans, etc.

We believe appropriate capital levels should be determined based on a thorough analysis of the individual financial institution.

I thank you in advance for your consideration of our concerns. Like yourself, we are committed to a sound financial system supporting a strong economy.

Sincerely,


John G. McCarthy,
Vice President
The Bank of Canton