



Our interest is in *you*.

March 21, 2006

Robert E. Feldman
Executive Secretary
Attn: Comments/ Legal ESS
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Dear Mr. Feldman:

The proposed guidelines regarding "Concentration in Commercial Real Estate Lending, Sound Risk Management Practices generates tremendous concerns for me as a Senior Lender of a community bank. Safe and sound commercial lending practices are a critical component of commercial real estate lending and we believe that our bank has established appropriate policies and practices to carry out our mission and serve our community. Additionally, we have a quarterly outside loan review of our portfolio to identify any weaknesses or trends needing attention.

The threshold tests proposed ignore the actual risk factors associated with our portfolio and these new regulations will require our mutual institution to increase its capital levels simply because we have a concentration in commercial and construction loans.

If a determination is made to implement the threshold tests then exclusions such as multi-family loans, pre-sold construction and construction/permanent loans should be made.

We are truly committed to serving the financial needs of our customers with a strong well-capitalized bank and we believe the present system of determining adequate capital levels based on a thorough analysis of the individual institution is appropriate.

Sincerely Yours,

William T. Treddin

Senior Vice President

The Bank of Canton