



Our interest is in *you*

March 22, 2006

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

Dear Mr. Feldman:

My name is Brian McDavitt. I am a Senior Vice President heading the Commercial Lending Group at The Bank of Canton.

Bank of Canton is a mutual financial institution established in 1835 to serve the needs of this community. For over 170 years the bank has successfully carried out the mission of serving our community. Our management and board of directors are totally committed to serving the evolving needs of our customers. In the past 20 years Bank of Canton has grown from a one branch bank to a six branch \$750 million asset bank. We provide superior customer service to our ever expanding customer base. During this period our bank has always been profitable.

We are a full service financial institution that provides commercial real estate, residential, consumer, construction and C& I loans. Each of these lending functions is vitally important to our community and overall strength of the American economy. Our team of nine lending professionals has significant lending experience. We are deeply concerned about the proposed arbitrary and mechanical new regulations concerning the concentration of construction and/or commercial real estate exposures. We believe the threshold tests are inappropriate because different types of commercial real estate have very different risk profiles. There is a huge difference in risk levels between CRE loans for contractor spec home construction, commercial construction, and land development- and development from non speculative CRE loans that have firm takeouts or established cash flow patterns.

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

We thank you in advance for your consideration of our concerns. We as well as you are committed to a sound financial system necessary for a strong economy.

Sincerely yours,

Brian W. McDavitt  
Senior Vice President