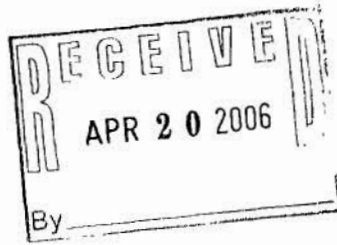




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960



April 12, 2006

Robert E. Feldman
Executive Secretary
Attn: Comments
Federal Deposit Insurance Corp.
550 17th Street, NW
Washington, D.C. 20429

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, D.C. 20552
Attn: No. 2005-56

Jennifer J. Johnson, Secretary
Board of Governors of the
Federal Reserve System
20th Street & Constitution Avenue, NW
Washington, D.C. 20551

Office of the Comptroller of the
Currency
250 E Street, SW, Mail Stop 1-5
Washington, D.C. 20219

Re: Proposed Interagency Guidance on Concentrations in
Commercial Real Estate

Ladies and Gentlemen:

This proposed Interagency Guidance on Concentrations in Commercial
Real Estate (hereafter referred to as "Guidance") seems to be based on
areas that have experienced significant value appreciation and lending
institutions that have exceeded the normal credit underwriting guidelines.

This Guidance would impose significant new requirements on community
banks, such as ours, as we engage in Commercial Real Estate ("CRE")
lending. If this Guidance is implemented, it would require us to invest a
significant amount of time, money and effort to counter the assumption
that we have an unsafe concentration of real estate loans.

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The new definition of a concentration in CRE combines several different types of CRE lending and establishes triggers for additional action without any attempt to distinguish the different levels of risk posed by each. This results in too many banks being deemed to have a high-risk concentration in CRE.

The Agencies should not issue this one-size-fits-all Guidance. Rather, we recommend that instead of imposing these new costs on the industry in general, the Agencies apply existing guidance on a case-by-case basis to address any problems in those banks not engaging in CRE lending responsibly.

I appreciate your time and consideration.

Sincerely,



Frank A. Suellentrop  
President

FAS:cw