

From: Don Gibson
Sent: Monday, September 11, 2006 10:01 AM
To: Comments
Cc: Gary George; Stafford, Steve
Subject: RIN 3064-AD06 Designated Reserve Ratio

Dear FDIC,

As a De Novo Bank that has a strong capital structure and strong Camel rating from our first exam, I certainly would like to be judged on the merits of our bank rather than on generic categories. The regulatory oversight that we have takes into consideration all of the change factors of a new institution to include Management and Board supervision and planning. This first hand valuation to me should have the most weight in valuation of risk and resulting FDIC insurance costs.

Respectfully,
Don L. Gibson
President and CEO
Legacy National Bank