

From: "Kirby, Kent" <Kent.Kirby@CommerceBank.com> on 02/09/2005 10:36:55 AM

Subject: Data Collection Shared National Credits

This is a comment to the Notice for Public Comment on the Shared National Credit Data Collection Modernization proposal, as cited in the 20 December 2004 edition of the Federal Register.

I notice that with the intention to standardize and expand reporting, the threshold for reporting remains the same that it has been for the past 27 years; \$20 million and three or more regulated lenders.

In 1977, a \$20 million transaction was considered major. However, in today's environment, that threshold covers a club credit of three local banks on a community development deal - hardly a "large syndicated credit." I do not think that there is much value to extend risk management monitoring that deep into the banks' portfolios. Certainly, benchmarking would be more relevant if such transactions were not allowed to cloud the analysis.

I would suggest a higher threshold is merited, say \$100 million and five banks? At this level, the issues, such as the risk from loss of control, become more apparent.

Best Regards,

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