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Sent: Tuesday, March 14, 2006 6:52 PM
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Bill Knox
Subject: Comments Dockets No 06-01;Docket No OP-1248; Docket No 2006-01

This is being sent on behalf of Craig Conklin, Vice Pres./Chief Lending Officer of Bank of Whitman, S. 201 Main, Colfax, WA 99111 (509) 397-4629 www.dcc@bankofwhitman.com

OCC - Comments to Docket No. 06-01

Board - Comments to Docket No. OP-1248

OTS - Comments to Docket No. 2006-01

RE: Concentrations in Commercial Real Estate Lending, Sound Risk Management Practices

After our review of the Concentrations in Commercial Real Estate Lending, Sound Risk Management Practices, Bank of Whitman has the following comments:

a. The proposed thresholds of 100% and 300% are too restrictive for community banks.

b. The detailed analysis and management system being recommended is cost prohibitive to smaller banks. Implementation will further erode earnings and capital creating additional risk to the health and vitality of community banks.

c. The assumptions by regulators are too general and broad based. Consideration of the banks historical problems, geographic location, management and capital should also be made part of the equation. Putting all CRE into one bucket for entire US does not address concerns.

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