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Sent: Thursday, January 19, 2006 5:50 PM
To: Comments, Regs
Subject: Docket No. 2006-01

On behalf of Clay County Savings Bank and its board of directors, I would like to respond to recent Interagency proposed guidance on commercial real estate loans. As a financial institution with only two assets acquired thru foreclosure in 20 years, we are concerned about the proposed guidelines. We believe the establishment of these thresholds will be viewed as limits or, at the very least, impose additional constraints on our ability to be competitive and make such loans by examiners imposing further regulatory burden. Despite our lack of problem assets historically, we believe examiners will not view our "risk management" as adequate because we do not have the staff or resources to perform some of the items requested. We were subject to such criticism from an examiner at our last examination even though a loan was not delinquent and we had made almost 80 loans to the builder in 20 years without any problems. We believe management's track and overall loan performance should be factored prior to establishing or requiring any arbitrary guidelines. Being a small community financial institution our lending is generally very conservative despite such "so called concentrations" and lack of certain documentation is not necessarily indicative of poor underwriting. Thank You.

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