From: MARIO USERA [usera@claycountysavings.com]
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 additionaly 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.


Mario Usera
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