

COMMUNITY
FEDERAL SAVINGS BANK

89-07 Jamaica Avenue
Woodhaven, New York 11421
Tel: (718) 847-6333
Fax: (718) 847-6444

March 8, 2006

Docket No. 2006-01

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G. Street, NW
Washington, DC 20552

Dear Sir:

Community Federal Savings Bank is a relatively new institution that was approved with a business plan stating our intention to target real estate loan products for multi-family and mixed-use residential and non-residential products. This makes it imperative that the regulators review in detail the ramifications of the proposed arbitrary threshold tests and their overall effects on the safety, soundness and profitability of the industry. The threshold tests do not take into account the different risk profiles of the different types of commercial real estate as defined in the proposal.

Construction loans are a source of interest rate risk protection and provide additional housing that helps to revitalize our communities. Construction loan risk can be mitigated by presold residential units, firm takeouts and/or established cash flow patterns.

Commercial loans including loans secured by multi-family and nonfarm nonresidential properties and loans for construction, land development and other land are all different and each institution limits their risks differently.

Lending is not an arbitrary business. Loan approval is based on the merits of the individual loan; so should the risk analysis.

Respectfully,



Stuart G. Hoffer
President/COO