

From: Tom Linneman [tlinneman@cheviotsavings.com]  
Sent: Monday, March 13, 2006 2:48 PM  
To: Comments, Regs  
Subject: Docket No. 2006-01

To whom it may concern,  
I am writing regarding the joint proposed guidance regarding "Concentrations in Commercial Real Estate Lending". Even though my institution does not have any significant Commercial Real estate loans, I feel the proposed guidance is too stringent. The agencies should not impose arbitrary thresholds that ignore the actual risk involved. In an environment where the smaller institutions are losing market share to competition of all sorts, we do not need the regulatory agencies to be another obstacle to overcome.  
The threshold tests are inappropriate because each commercial real estate loan has different risk profiles and should be reviewed accordingly.

Sincerely,  
Thomas J Linneman  
President Cheviot Savings Bank