

From: Brian Sellnow [bsellnow@fcb.com]
Sent: Thursday, February 16, 2006 1:53 PM
To: Comments, Regs
Subject: Commercial Real Estate Lending Guidance

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February 16, 2006

William Magrini

Dear William Magrini:

Dear Sirs;

After reviewing the proposed guidance on real estate lending, I have a few concerns about the following topics:

First, that there are many new requirements which may be unnecessarily disruptive to our industry, and which may in fact not be uniformly applied.

Secondly, that the guidelines do not take into account the wide variety of institutions and customers, and do not offer the flexibility that our institutions may require to deal with individual situations. In particular, there should be no automatic requirement for an increase in capital reserves just because a particular threshold is exceeded, without taking into account other circumstances at the individual institution.

Since the purpose of legislation has historically been the promotion of responsible banking in service to our customers, we should ensure that our efforts are not detrimental either to the industry or our clients. Real estate and commercial lending, conducted in a safe and responsible manner, are critical to the sustained growth of our economies.

Thank you for considering these points of view and I hope that they have been helpful as you craft the new guidelines.

Sincerely,

Brian Sellnow