



February 14, 2006

Office of the Comptroller of the
Currency
250 E Street, SW
Public Information Room
Mail Stop 1-5
Washington, DC 20219
Attn.: Docket No. 05-21

Robert E. Feldman
Executive Secretary
Attn: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552
Attn.: Docket No. 2005-56

Jennifer Johnson
Secretary
Board of Governors of the
Federal Reserve System
20th St. and Constitution Ave, NW
Washington, DC 20551
Attn.: Docket No. OP-1246

Re: Proposed Guidance- Concentrations in Commercial Real Estate Lending, Sound
Risk Management Practices
71 FR 2302 (January 13, 2006)

Dear Sir or Madam:

America's Community Bankers (ACB)¹ appreciates the opportunity to comment on the Proposed Guidance –Concentrations in Commercial Real Estate Lending, Sound Risk Management Practices² (“Proposed Guidance”) issued by the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, and the Office of Thrift Supervision (collectively, the “Agencies”).

ACB urges the Agencies to extend the March 14, 2006 due date for comments on the Proposed Guidance by 30 days. The Proposed Guidance was published in the Federal Register on January 13, 2006 and we believe an extension would be beneficial for all parties.

¹ America's Community Bankers is the member driven national trade association representing community banks that pursue progressive, entrepreneurial and service-oriented strategies to benefit their customers and communities. To learn more about ACB, visit www.AmericasCommunityBankers.com.

² 71 FR 2302 (January 13, 2006).

The proposal is extremely complex and has far-reaching consequences for our members, as well as for the nation's mortgage markets. We believe that it will take an additional 30 days to complete the necessary evaluation and collect comments and data from our membership. A 30-day extension would enable our association to provide the Agencies with the most meaningful comments on the Proposed Guidance.

For these reasons, we request that the Agencies extend the comment period on the Proposed Guidance to April 13, 2006. We appreciate your consideration of the requested extension and urge you to make a determination as quickly as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia A. Milon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Patricia A. Milon
Senior Vice President
Regulatory Affairs