

From: Lori Rostkowski [lrostkowski@rockportnational.com]  
Sent: Thursday, April 13, 2006 2:51 PM  
To: Comments@FDIC.gov; Comments, Regs;  
regs.comments@federalreserve.gov; regs.comments@occ.treas.gov  
Subject: Interagency Guidance on Concentrations in Commercial Real Estate Comment

Ladies and Gentleman:

As a small community bank, Rockport National Bank supports the local tourist market and small fishing industry. We are fully aware of the risks involved in these concentrations and monitor them closely. To this end the Bank already invests a great deal in time and resources ensuring that we have a secure commercial real estate portfolio.

In addition to the constant monitoring by Bank management, the Board of Directors receives detailed quarterly reports on loan concentrations and criticized assets. Yearly, an outside consultant is hired to review the commercial portfolio, the external auditors issue an opinion on the financial status of the Bank and the OCC visits every eighteen months.

On a positive side we have had great success with the "Pilot Lending Program" which would be jeopardized with the proposed guidance.

We acknowledge that you are aware of the measures that community bankers undertake to address the current regulations and financial environment, but I feel that it by reiterating these items it will be evident that the current guidance and policies are sufficient for the majority of the community banks. Those that are causing this concern should be dealt with separately.

This proposed guidance would have a significant adverse impact on Rockport National Bank and the local area. It would effect the way we would lend to our local fisherman and Innkeepers, who keep this a thriving tourist community. Please look at the measures already taken by community banks to lend responsibly and monitor those credits versus identifying another avenue besides the Allowance for Loan Losses to cover potential risks.

Sincerely,

Peter A. Anderson  
President

and

Lori G. Rostkowski  
Vice President  
Loan Administration

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