



303 LEOPARD LANE BRIDGEWATER, PA 15009

August 17, 2006

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

RE: Proposed Rulemaking No. 2006-29

Dear Sir or Madam:

I am writing on behalf of Union Building and Loan Savings Bank, a mutual institution, in support of a proposed rulemaking by the Office of Thrift Supervision captioned "Stock Benefit Plans in Mutual-to-Stock Conversions and Mutual Holding Company Structures," (No.2006-29).

We urge you to adopt this rule as proposed in order to preserve the full benefits of the mutual holding company charter form.

Sincerely,

Mark E. Nelson

Vice President and Trustee

Union Building and Loan Savings Bank

MEN:mkm