

B Beneficial
SAVINGS BANK

510 WALNUT STREET
PHILADELPHIA, PA
19106-3697
215-864-6001

GEORGE W. NISE
President &
Chief Executive Officer



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 Beneficial 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,

