

# GLENN ABER

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September 17, 2006

VIA FACSIMILE AND EMAIL

Regulation Comments, Chief Counsel's Office  
Office Of the Thrifts Supervisions  
1700 G Street, NW  
Washington, DC 20552  
Att: No. 2006-29

Re Notice of Proposal Rulemaking regarding Stock Benefit Plans in Mutual-To-Stock Conversions and Mutual Holding Companies Structures  
71 Fed. Reg. 41179 (July 20, 2006) No. 2006-29

To Whom It May Concern,

As a stock shareholder in bank stocks for fifteen plus years and a strong advocate of shareholder rights, I am strongly opposed to the above proposal amending the current protection given minority public shareholders in mutual holding companies. Since 1994, an affirmative vote of a majority of the public share holders has been required to change the MHC stock benefit plan. This has been an important way of preventing insider abuse by management. Allowing insider management to regulate their stock benefit plans could easily lead to improper abuse by management.

The current policy protects minority shareholders and prevents insider abuse. It makes no sense to give the decision and control to management who could vote for their own benefits at shareholder expense.

Sincerely



Glenn Aber

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