

Hardie B. Kimbrough, Jr.  
Executive Vice President  
Comptroller



October 30, 2008

Honorable Randall S. Kroszner, Governor  
Board of Governors of the Federal Reserve System (FRS)  
20th and C Street, NW  
Washington, DC 20551

Attention: Comments - R-1329

**Re: Capital Deduction of Goodwill Net of Associated Deferred Tax Liability**

Dear Sir,

On behalf of Regions Financial Corporation, I am writing in support of the proposal allowing banking organizations to deduct goodwill net of any associated deferred tax liability for Tier 1 Capital. We estimate that our Tier 1 Capital ratio would increase approximately 6-7 basis points as a result of this proposal.

Please feel free to contact my office should you wish to discuss this important matter.

Sincerely,

A handwritten signature in cursive script that reads "Hardie B. Kimbrough, Jr.".

Hardie B. Kimbrough, Jr.  
205.326.4972

Post Office Box 11007  
Birmingham, Alabama 35288