

**From:** "Hefner, Keith (CBT)" <KeithHefner@cbankandtrust.com> on 05/20/2005  
11:41:51 AM

**Subject:** Classification of Commercial Credit Exposures

We wish to express our opposition to the proposed changes to the current loan classification categories. As presented, the new rating system will be more complex and burdensome on smaller banks with little, if any, substantive improvement in risk evaluation. Smaller institutions are already spending an extraordinary amount of time and resources to comply with regulatory issues. The proposed changes to the loan rating system will only compound that burden.

Respectably

**D. Keith Hefner**  
**President & CEO**  
**Citizens Bank & Trust Company**