

**From:** "Kelly Ashcraft" <wbtkelly@sbcglobal.net> on 06/30/2005 10:51:41 AM

**Subject:** Classification of Commercial Credit Exposures

In response to docket number OP-1227, concerning a proposal to change the current Loan Classification methodology, I am not in agreement with the new proposal based on the following:

- \* The proposed system will be more burdensome and complex for smaller institutions.
- \* The present terminology is understood by both regulators and bankers. Therefore, why would it be necessary to  
do away with our current system and implement a more complex system based on a two dimensional framework.
- \* Is it necessary for the proposal to apply to all banks or for banks of a specified limit of \$1 billion or higher?
- \* Does there exist a big enough problem with the rating disparities to require a new rating system?

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