

# ***WELCH STATE BANK***

*MIAMI BRANCH*  
*Member FDIC*

P.O. Box 1620  
Miami, OK 74355

PH 918-542-2000  
FAX 918-542-2032

---

June 29, 2005

Jennifer J. Johnson  
Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551

Re: Interagency Proposal on the Classification of Commercial Credit Exposures

Greetings:

We appreciate the opportunity to comment on the proposal to change the classification system for Commercial Credit Exposure. Our bank is opposed to this change and we ask that it be withdrawn.

The reason we would like to see it withdrawn is that the current system we have is working well. Implementation of a new system, which we perceive would have no benefit, would be an unnecessary burden on a limited staff.

Serving our community is what we do best. We are already overburdened with regulatory overkill to the point that serving our community sometimes takes a back seat. We accept that we are in the risk business and work hard to recognize loan problems early and maintain satisfactory reserves. We just do not see that the proposed changes would improve the current classification process.

Thank you for your cooperation and for the opportunity to comment.

Sincerely



Kevin W. Bullard  
Exec. Vice President