

From: Cameron L. Forrester

Subject: Classification of Commercial Credit Exposures

Date: Jun 16, 2005

Proposal: Interagency Proposal on the
Classification of Commercial Credit Exposures
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Comments:

@@@June 16, 2005

Robert E. Feldman, Executive Secretary
Attention: Comments, Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

RE: Change in Classification of Loans

Dear Mr. Feldman:

I am writing to express my opposition regarding the changes in commercial loan classifications. Should these changes occur the Borrower Rating and Facility Ratings would be more complex and burdensome on the small banking institutions. The small banking regulators and bankers have developed a common vocabulary and understanding of terminology. A change in the vocabulary and terminology would result in confusion to all involved. The question arises, if there is a big enough problem with the rating disparities to require a new rating system. Would it not be best to propose a threshold for larger banks instead of applying this proposal to all banks?

Thank you for your time and consideration in this request.

Sincerely,

Cameron L. Forrester
Senior Vice President & Chief Lending Officer

CLF/ba

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