

From: "Bruce Benyshek" <bruceb@equitywebbank.com> on 10/27/2005 05:30:06 PM

Subject: Capital Adequacy Guidelines for Bank Holding Companies

Thank you for the opportunity to comment on this matter.

We have a holding company with one community bank subsidiary in the Wichita, Kansas area that we purchased in 2003. Our total consolidated assets are now approximately \$143 million. Thus, raising the small BHC definition from \$150 million to \$500 million in total assets is very important to us and a move that we strongly support.

As your proposed rule indicates, the \$150 million number has not changed since its inception in 1980, and inflation, industry consolidation and normal growth have rendered that figure obsolete in today's environment. We also agree with your comments regarding the difficulties in accessing the capital markets for BHC's of under \$500 million.

Again, we strongly support raising the small BHC definition from \$150 million to \$500 million in total assets.

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