

**From:** "John P. Bowers" <jpbowers@firstbank.com> on 04/11/2006 03:45:02 PM

**Subject:** Commercial Real Estate Lending

Ladies and Gentlemen:

My name is John Bowers and I serve as a Senior Vice President of First Bank and Trust Company located in Staunton, Virginia. I am writing you specifically to voice my opposition to the proposed commercial real estate lending regulations (Docket No. OP-1248 Commercial Real Estate Proposal). I feel this proposed regulation would be simply overkill and actually caused an artificial recession in the real estate market. In addition, I do not think it is wise to regulate or penalize banks that adhere to strong credit guidelines and are not a part of the problem. It seems logical that you would try to regulate the problem areas and correct specific problems as to not cause an undue effect on other institutions and the real estate market as a whole. Lastly, I feel this type of regulation could actually cause a bank to move more toward unsecured lending in the real estate market thus compounding the problem.

I feel strongly about this as I have been a banker for over 18 years and have always adhered to good credit underwriting standards and do not want my bank or other banks to be penalized for other's mistakes and poor underwriting.

Sincerely,

John P. Bowers  
Senior Vice President  
Commercial Lending  
First Bank and Trust Company  
(540)885-8000