

From: "John Puffer" <jpuffer@pilotbank.com> on 02/16/2006 08:55:00 AM

Subject: Interagency Concentrations in Commercial Real Estate Lending

John Puffer
Tampa, FL 33612-6278

February 16, 2006

Jennifer Johnson

Dear Jennifer Johnson:

I am concerned about the Guidance being proposed with respect to commercial real estate lending. Commercial real estate lending is an extremely important part of the Florida economy. Broad brush regulations regarding a particular type of lending are likely to have the unintended consequence of materially affecting negatively the types of businesses that give rise to "regulatory concern". What is important is for banks to have consistent lending practices that evaluate the risks presented by specific borrowers. Current regulations address this.

The proposed guidance assumes that a particular class of borrower is high risk. This will result in a self fulfilling prophesy that will impair the ability of all in the commercial real estate industry to obtain credit.

Thank you for your consideration of these concerns and comments. I hope that you will recognize the Guidance is unnecessary and encourage examiners to focus on how individual banks are managing specific credits.

Sincerely,

John W. Puffer, III