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April 6, 2006

Ms. Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
Attention: Docket No. OP-1246
20th Street and Constitution Avenue, NW
Washington, DC 20551

Ms. Johnson:

As a community banker, I appreciate the opportunity to comment on the proposed guidance entitled Concentrations in Commercial Real Estate Lending, Sound Risk Management Practices (Guidance). While I understand that the federal regulatory agencies have expressed concern with the high concentrations of commercial real estate loans at some institutions, I believe the proposed guidance will have a serious impact on community banks and local economies in general.

Commercial real estate (CRE) lending has been an important business line for my institution and many other banks in Massachusetts. Community banks play an essential role in creating local economic growth by providing credit to small and medium-sized businesses for construction and land development. The proposed guidance will place a significant regulatory burden on banks that have a market niche in commercial real estate loans, limiting the institution's future growth in this area and possibly forcing some banks out of the market altogether.

I am particularly concerned with the "one-size-fits-all" nature of the proposed guidance. Institutions are automatically classified as having a "CRE concentration" simply if they exceed the thresholds. Portfolio diversification or other risk mitigation procedures are not taken into consideration. Because real estate markets vary greatly from region to region, and even within a particular state, the agencies should focus more attention on local market conditions and the overall condition of the individual institution than generic thresholds broadly applied to all banks.

The guidance encourages institutions to adopt a series of the proposed risk management principles if a CRE concentration exists. While many banks may have some of these procedures in place, others will be cost-prohibitive for community banks. For instance, there are few effective stress tests available to smaller institutions. If institutions are unable to adopt these principles, some may leave the CRE market altogether. This will disproportionately affect urban areas, since the guidance exempts many of the loans made in rural areas from the threshold calculations. Many times, community banks are the only source of credit available to small business owners in these distressed areas. Forcing banks to reduce or abandon CRE lending in these neighborhoods could inhibit revitalization efforts and leave business owners with no choice but to turn to more expensive forms of credit.

163 South Main Street
Bradford, MA 01835-7322
(978) 374-2600
fax: (978) 556-4288

180 Merrimack Street, P.O. Box 1656
Haverhill, MA 01831-2356
(978) 374-0161
fax: (978) 556-4256

1094 Main Street
Haverhill, MA 01830-1448
(978) 556-4200
fax: (978) 556-4209

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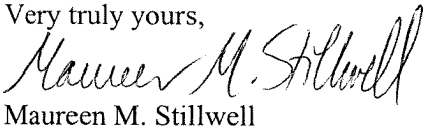
In addition, the guidance recommends increased capital levels for banks with CRE concentrations. This requirement will place a serious burden on mutual institutions, which represent 70 percent of the banks in Massachusetts and who rely on earnings as their sole source of new capital. Therefore, these institutions would be forced to reduce levels of a strong earning asset in commercial real estate during a period of significantly reduced margins.

Finally, the proposed guidance comes at a time when the agencies are also proposing changes to the capital system through the Basel I-A process. Both proposals could have a significant impact on community banks, and I encourage the agencies to better coordinate their efforts in this area.

Thank you again for the opportunity to comment on the proposed guidance and for considering my views.

Very truly yours,



Maureen M. Stillwell
Assistant Vice President