



May 24, 2005

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

Re: Classification of Commercial Credit Exposures
FIL-22-2005

Dear Mr. Feldman,

It has come to my attention that currently a proposal exists to change the format as to how banks classify various risk ratings associated with our loan portfolio. I have been a banker for more than 30 years and I would highly question any change or deviation from our current system of ratings used to determine the adequacy of our loan reserve account.

The existing system of identifying loans that are Special Mention, Substandard, Doubtful, and Loss are well defined already, with any change providing no additional benefit, and a lot of new misunderstanding among the banking industry. I strongly urge your consideration of not changing a methodology that is well entrenched in the banking industry and has worked well for so many years. I am not opposed to change if it is justified and needed. This change is not needed!

Sincerely yours,

John D. Manatt
President/CEO