



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

November 5, 2008

Mr. Ernest Garfield
Chairman
Interstate Bank Developers, Inc.
8442 N. 72nd Place
Scottsdale, AZ 85258

Dear Mr. Garfield:

Over time, the OCC has received many valuable insights from private sector participants active in bank chartering. We know that you work closely with organizing groups and provide advice on state and national charters. Your willingness to share your experiences has helped us make several improvements to the bank chartering process.

Many of the improvements are focused on communication, cost, and burden. We stand ready to travel to the organizers for exploratory and pre-filing meetings. We will review draft applications to provide early direction, and we will begin personal background checks earlier in the process as requested. Because cost is a key concern for all national banks, we have adjusted our corporate activities fee structure and suspended new bank application fees.

Additionally, we have eliminated or revised certain procedures. For example, our review of organizational expenses and officers' salaries is focused more on a proposal's overall viability than a line-by-line accounting. Audited financial statements are no longer required at the in-organization phase. And we increased the shareholder number threshold for application of current and periodic reporting requirements under the Securities Exchange Act.

Collectively, all these changes enhance the efficiency and focus of our licensing process, without compromising the soundness and quality we expect of national banks. These changes represent only the start of our review. Please continue to provide us with frank feedback, and we will continue to update you on our progress. For your convenience, we've enclosed a brochure that highlights some of the important changes.

Sincerely,

Lawrence E. Beard
Deputy Comptroller, Licensing

Enclosure