Lindsey Management Company, Inc.

1165 Joyce Boulevard □ P.O. Box 13000 □ Fayetteville, AR 72703 □ 479.521.6686 □ Fax 479.527.8854

March 6, 2006

Via E-Mail: **OCC** **regs.comments@occ.treas.gov**
Board **regs.comments@federalreserve.gov**
FDIC **comments@FDIC.gov**
OTS **regs.comments@ots.treas.gov**

Office of the Comptroller of the Currency, Treasury (OCC); Board of Governors of the Federal Reserve System (Board); Federal Deposit Insurance Corporation (FDIC); and Office of Thrift Supervision, Treasury (OTS).

RE: OCC Docket No. 06-01
Board Docket No. OP-1248
OTS Docket No. 2006-01

Ladies and Gentlemen:

Lindsey Management Company, Inc. is an Arkansas based developer and operator of multi-family housing. We have been in business since 1981 and currently own and operate more than 25,000 apartment units in a seven-state region, providing homes for over 60,000 people. We consistently build 2,000 new apartment units each year at a cost of more than $100,000,000.00, providing jobs for hundreds of people and adding stability to the local tax bases. We have been able to maintain this growth because of our relationships with lenders who know us, know our history, know our markets, and know our products and services. Many of these lenders are small community banks who participate with others like them to finance our new projects.

We understand the concerns of those who fear that the real estate "bubble" will burst, leaving lenders with overvalued properties and borrowers without the ability to meet their obligations. Our business operates in America's heartland and we haven't experienced the meteoric rise in land prices found in some of the nation's coastal areas. Yet the same underwriting standards that apply to megabanks financing construction in California, New York or the Gulf Coast will apply to community banks in Arkansas, Missouri, Oklahoma, Kansas and other central states in which we do business.

We believe the proposed regulations are unnecessarily stringent and would have a host of unintended consequences, including:

1. Depressed land values due to decreased availability of real estate financing;

2. Increased unemployment, especially in construction, real estate management and sales, and banking related industries;
3. Stifled growth in business and industry because of the decrease in supply of new housing for their employees;
4. Increased foreclosures resulting from developers' inability to complete or expand developments, and from banks who must pressure them to move their real estate loans;
5. Increased bank failures, because of all these problems.

For these reasons, we ask that you do not adopt the proposed real estate lending standards. Please contact me if you wish to discuss this matter further.

Sincerely,

James E. Lindsey, Chairman
Lindsey Management Company, Inc.
1165 Joyce Blvd.
Fayetteville, AR 72703
Tel. 479-521-6686
jim.lindsey@lindseymanagement.com

cc: Hon. Mark Pryor: senator.pryor@pryor.senate.gov
Hon. Blanche Lincoln: blanche_lincoln@lincoln.senate.gov
Hon. John Boozman: boozman.congress@mail.house.gov
Hon. Marion Berry: berry.congress@mail.house.gov
Hon. Vic Snyder: snyder.congress@mail.house.gov
Hon. Mike Ross: ross.congress@mail.house.gov