

From: Richard Conniff

Sent: Friday, July 17, 2009 8:51 PM

To: Comments

Subject: RIN # 3064- AD37 Potential Extension of the TAG Program

We are commenting in favor of extending the TAG Program until June 30, 2010. We believe the TAG Program levels the playing field for community banks, particularly those of us providing credit to small businesses that may, from time to time, exceed \$250,000 in qualifying noninterest bearing transaction accounts. We believe that a permanent extension of the TAG program would further enhance the capacity of community banks to provide credit to small business.

In further consideration of the potential extension, please consider allowing banks who are not currently including NOW accounts as qualifying noninterest bearing transaction accounts to include them provided that the interest paid does not exceed the maximum for the TAG Program on the effective date of the TAG extension and the bank agrees that the interest rate will not exceed the maximum during the duration of the TAG program. We believe that allowing banks not currently treating NOW accounts as qualifying noninterest bearing transaction accounts to enter the program will allow those banks, if they choose, to more effectively compete for deposits.

Thank you for your consideration.

Richard L. Conniff, CEO
Focus Business Bank
10 Almaden Blvd., Suite 150
San Jose, CA 95113