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James S. Keller
Chief Regulatory Counsel

March 13, 2006

Mr. Robert E. Feldman
Executive Secretary
Attn: Comments/Legal ESS
Federal Deposit Insurance Corp.
550 17th Street, N.W.
Washington, DC 20429
Comments@FDIC.gov

Re: Advance Notice of Proposed Rulemaking: Large-Bank Deposit Insurance
Determination Modernization Proposal, RIN 3064-AC98

Dear Mr. Feldman:

PNC Bank, National Association (“PNC Bank”), Pittsburgh, Pennsylvania, appreciates the opportunity to comment on the Advanced Notice of Proposed Rulemaking (“ANPR”) issued by the FDIC as the first step in the process of developing new rules for determining the insurance status of deposits held by larger depository institutions. (70 Federal Register 73652 (Dec. 13, 2005)).

PNC Bank, National Association (“PNC Bank”), Pittsburgh, Pennsylvania, is the principal subsidiary bank of The PNC Financial Services Group, Inc., (“PNC”), Pittsburgh, Pennsylvania, which is one of the largest diversified financial services companies in the United States, with \$ 92.0 billion in assets as of December 31, 2005. PNC engages in retail banking, institutional banking, asset management, and global fund processing services. PNC Bank has branches in the District of Columbia, Florida, Indiana, Kentucky, Maryland, New Jersey, Ohio, Pennsylvania and Virginia. PNC also has a state non-member bank subsidiary, PNC Bank, Delaware, Wilmington, Delaware, which has branches in Delaware.

Option 3

We have worked with The Financial Services Roundtable in drafting its comments, and generally concur with the remarks in its comment letter. As one of the 20 largest banks in the country, PNC Bank would be subject to Option 3 set forth in the ANPR, and therefore we are submitting supplementary comments with respect to this Option. Because only those banks would be subject to Option 3, it may have a negative competitive impact on large banks. Although the ANPR exempts these banks from having to calculate the insured position of customers with respect to certain informal fiduciary accounts (such as “payable-on demand” or “in-trust-for” accounts), customers of these banks, especially those who have consciously chosen to expand their FDIC insurance coverage using different ownership categories, may expect and demand that their bank provide a full account of their insured position in order not to be

disadvantaged. That would further amplify the availability of data issue referred to by The Financial Services Roundtable, as well as increase the cost of implementation.

Customer Record Fields

The proposed Customer Record descriptions in Fields 6 and 7 should be scrutinized by the appropriate technical analysts at the FDIC to ensure that the proposed codes do not conflict with current codes used to designate relationships and beneficiaries.

Regulatory Burden

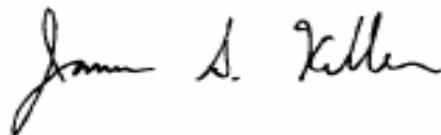
The ANPR notes that internal bank testing will have to occur for each Option, and it is clear that if the FDIC is planning to rely upon banks to perform the insurance calculation, testing activities, in particular for Option 3, will have to be fairly significant and routine. In addition, despite assurances regarding the limited nature of testing, customer privacy concerns are inevitable.

Representatives from the systems and data storage areas of PNC Bank are continuing to assess the scope and cost of the work set needed to achieve the goals of these proposals. At this point, their perception is that it will be a significant cost and effort. We hope that there will be additional opportunities to present those findings once they are able to draw some more specific conclusions.

Conclusion

PNC Bank appreciates the opportunity to comment on the proposal, and hopes that these comments will be useful to the FDIC in its further actions on this ANPR.

Sincerely,

A handwritten signature in black ink that reads "James S. Keller". The signature is written in a cursive style with a large initial "J" and "K".

James S. Keller

cc: Gary TeKolste
Michael Carroll