

Mountain View, MO
 Houston, MO
 West Plains, MO
 Willow Springs, MO
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November 10, 2008

OFFICE OF
 THE EXECUTIVE SECRETARY

Robert E. Feldman
 Federal Deposit Insurance Corporation
 550 17th Street North West
 Washington, DC 20429

Re: Notice of Proposed Rulemaking (RIN 3064-AD35)

Dear Mr. Feldman:

First National Bank welcomes the opportunity to comment on the Federal Deposit Insurance Corporation (FDIC) Notice of Proposed Rulemaking proposing changes to the FDIC's deposit insurance assessment regulation. In particular, we would like to respond to the request for comments on whether "deposits received through a network on a reciprocal basis that meet the statutory definition of brokered deposits be excluded from the definition of brokered deposits for purposes of the adjusted brokered deposit ratio or the brokered deposit adjustment?"

First National Bank is a locally owned community bank based in Mountain View, Missouri. We pride ourselves in offering a full range of products and services to our local customers to meet their financial needs. Included within our product offerings is Certificate of Deposit Account Registry Service (CDARS), which meets the description of a reciprocal placement service in your proposal. Because CDARS deposits are stable sources of core funding that do not present the characteristics of traditional brokered deposits, we strongly believe CDARS Reciprocal deposits should be excluded from the definition of brokered deposit for the purposes of this proposal. We enjoy the ability to set interest rates for CDARS locally and have been pleased with the high rates of reinvestment of our CDARS placements.

In addition to the high renewal rates that our customers have displayed, we have found that our customers take advantage of our CDARS offering because they find it more convenient to maintain a single banking relationship with us rather than going to multiple banks only to obtain additional deposit insurance protection. We feel that CDARS supports our mission as a local bank working with local customers.

Since CDARS deposits do not exhibit any of the characteristics of traditional brokered deposits, CDARS deposits should not be treated like brokered deposits for purposes of the proposed assessment regulation. In summation, we strongly urge the FDIC to support legislation explicitly exempting CDARS Reciprocal deposits from the definition of brokered deposit in the FDI Act definition, which would conclusively settle any uncertainty as to the status of CDARS.

We appreciate the opportunity to comment on this proposal.

Sincerely,

Logan Dale
 President & CEO

cc: Sen. Claire McCaskill

717 Hart Senate Office Building
 Washington, DC 20510

Sen. Kit Bond

274 Russell Senate Office Building
 Washington, DC 20510