

BANK OF ST. ELIZABETH
Brice A. Luetkemeyer, EVP/CEO bluetkemeyer@ste-bank.com

November 6, 2008

Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429

Re: RIN 3064-AD35, Proposed FDIC Premium Increase

Dear Mr. Feldman:

I am writing in response to the Federal Deposit Insurance Corporation's (the "FDIC") request for comments on a proposal to increase deposit insurance premiums. If adopted, the proposal would among other things, establish a 20% growth threshold over four years. This is only 5% growth per year, which we cannot view as "aggressive." We would suggest 10% growth per year. We purchased another local bank a couple of years ago, and believe that such a purchase should be excluded from the calculation of "growth".

Thank you for your consideration.

Sincerely,



Brice A. Luetkemeyer

EVP/CEO

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