

Consolidated

BANK & TRUST

October 21, 2008

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

Dear Mr. Feldman:

Consolidated Bank and Trust (CB&T) gathers the vast majority of its CDARS deposits from its geographical area. We know and deal with these customers on a regular basis. Fortunately, our deposits are not hot, out of town money. Our CDARS deposits tend to be stable in nature.

CDARS deposits have very acceptable reinvestment rates and most are renewed. In addition, the interest rates on CDARS reflect our bank's local market. CDARS deposits are typically gathered at a cost of 20 to 40 basis points (depending on maturity) less than the cost of traditional brokered deposits.

CDARS is good for banks and for the banking industry as a whole. It has helped to prevent "runs" on banks. It gives community banks (especially minority depository institutions) the ability to hold on to our largest and most valuable customers, keeping relationship-based funding that otherwise could go to mega-institutions or require the pledging of precious collateral. By having the availability of CDARS, we are able to keep funds in the communities where they originate, thus enabling us to support local loan demand.

In closing, we urge the FDIC not to punish stable community banks by substantially increasing deposit insurance premiums on CDARS deposits. These deposits are not "brokered deposits" in relation to "traditional brokered deposits".

Thank you for your careful consideration of this issue.

Sincerely,



Joseph L. Williams, Jr.
Chairman, President & CEO
Consolidated Bank & Trust Co.



Richard A. Stark
SVP/Cashier
Consolidated Bank & Trust Co.

Cc: Mr. Robert Walker
Chairman/CEO
Abigail Adams National Bancorp