

**From:** Dalen D. Harrison [mailto:DHarrison@rainierpac.com]  
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**Subject:** Part 337 -- Interest Rate Restrictions - AD41

I would like to comment regarding the FDIC proposing to amend its regulations related to the interest rate restrictions that apply to insured depository institutions that are not well capitalized. The proposed rulemaking would permit depository institutions that are not well capitalized, to offer the “national rate/market rate” plus 75 basis points. The “national rate/market rate” is defined as an average of rates paid by **all insured** depository institutions and branches for which data is available, and which are similar in size and maturity. The proposed rulemaking does not define whether “similar depository institutions” also considers credit unions within this “national/market rate”. In our market area the depository geography consists of \$8.5 billion in insured deposits from banks and \$1.5 billion from credit unions. The credit union portion of these insured deposits represents 15% of our depository geography. I believe that credit unions should therefore also be considered for **all insured** depository institutions that are subject to these statutory restrictions if a large portion of the institution’s depository geography is comprised of credit union deposits.

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