From: Mike Bush [mailto:mmb1111@bellsouth.net]
Sent: Tuesday, March 31, 2009 12:46 PM
To: Comments
Subject: Assessments - Interim Rule - RIN 3064-AD35

RIN 3064-AD35

COMMENTS ON FDIC ASSESSMENTS
ANSWERS TO ISSUES NUMBERED IN REQUESTS FOR COMMENTS

IV. REQUESTS FOR COMMENTS

1.) NO
2.) NO
3.) (a) No. (b) No (c) No (d) No
4.) NO
5.) (a) If it is needed to maintain DIF at reasonable amount to keep deposits forth in system. (b) No (c) No
6.) No, all should pay equally.
7.) Should institution be eligible to use assessment credits toward special assessments? No

B. <u>SOLICITATION OF COMMENTS ON USE OF PLAIN LANGUAGE</u>

1.) GLB caused problem.
2.) Banks should never not pay into D.I.F. – If the FDIC did not know what happened was coming – then maybe we need to review FDIC procedures of review, especially of big “systemically important institutions”._____A recent quote was “If an institution is “too big to fail”, then it is “too big!” Let’s start there and work these “systemically important institutions.” to a manageable size. After either they or the government refund the DIF for the losses caused by small community bank failures, which were caused by the **<u>overall risk</u>** the “systemically important institutions” caused to the whole world not just to our banking system.

The FDIC – DIF fund was never designed to be able to cover the risk that a “systemically important institution” brought to the system after G.L.B. – “Any systematically important institution” above $500B – if it needed to be closed on the “least cost resolution”, the check that needed to be written was larger than the entire DIF at its high point of $54B Jan. 1, ’08.

Based on my analysis of the FDIC quarterly financial reports of the big “3”, “systemically important institutions” created by G.L.B. (supposedly to allow them to compete in the “Global Market”), If you review their Balance Sheets, C & I loans have decreased and commercial and residential real estate First mortgages, HELOC, and credit card debt are the three biggest assets on the B.S. of these institutions. Not exactly what Congress was told by these “systemically important institutions” to get G.L.B. passed.

“If a bank is “too big to fail – it is too big” and should pay their fair share to the FDIC Insurance Fund and it should be based on total assets – capital. The risk to the fund is not the deposits (or where they came from). It’s the assets that cause the risk. Michael M. Bush, Mississippi River Bank, Belle Chasse, Louisiana