From: Dave Kingland [mailto:dkingland@mbtbank.com] Sent: Tuesday, March 31, 2009 7:10 PM To: Comments Subject: Assessments, RIN 3064-AD35

The 20 basis point special assessment will have a big impact on our earnings. Due to a high unemployment level in our area, low loan demand, and higher than normal no-performing loans our projected net income was already 38% lower than where it should be. This 20 pt spec. assessment would lower it to nearly 50% lower than normal.

It appears to me that:

- 1. Community banks are paying more than their fair share
- 2. FDIC should increase borrowing authority from the Treasury

3. There should be a higher assessment for very large banks, or the banks considered too large to fail. Because of the concentrated risk to the FDIC and the financial system, they should pay a systemic risk premium based on asset size.

Please reconsider the proposed Special Assessment, I would propose 10 pts rather than 20 pts and the balance needed from the large banks that put the system at risk.

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