

April 1, 2009

Mr. Robert E. Feldman
Executive Secretary
Attn: Comments, Federal Deposit Insurance Corporation
550 17<sup>th</sup> Street N.W.
Washington, DC 20429

Re: Assessment, RIN 30654-AD35

Dear Mr. Feldman:

I am writing to express my concern over the proposed special assessment to recapitalize the Deposit Insurance Fund. While I understand that the fund is under extreme stress in the current economic environment, to say this proposed assessment is counterproductive would be an epic understatement.

At a time when banks are being encouraged to increase lending and are taking it upon themselves to be leaders in their communities from both a philanthropic and safety and soundness standpoint, this proposed assessment will pose a significant setback to these initiatives.

We are a relatively small community bank with approximately \$345 million in deposits. The proposed special assessment, if it were 20 basis points, would represent more than 20% of our budgeted net income for 2009. Even a 10 basis points assessment would represent more than 10% of our budgeted net income for the entire year.

As we are a public company, prudent management would dictate that we reduce other expenses to offset any assessment to ensure that we maintain shareholder value. These types of cuts are counterproductive to stimulating our local economy and counterproductive to the bank organically building its capital base.

Banks are already struggling with increased delinquencies, Other Than Temporarily Impairment on securities portfolios, shrinking net interest margins and the proposed assessment will further exacerbate these issues and prolong difficult economic times.

I implore you to consider alternate strategies that are less punitive so that we can effectively go about restoring the financial health of the communities we serve.

Sincerely,

Richard J. Car

President and Chief Operating Officer

cc: Senator Christopher Dodd Senator Joseph Lieberman