From: Kenneth Zilka [mailto:KENZILKA@ABOC.COM] Sent: Friday, March 06, 2009 9:59 AM To: Comments Subject: RIN 3064-AD35 Assessment

This new proposed assessment to Banks will squeeze Banks earnings even further in a time of Banking crisis. This becomes even more absurd when the FDIC has an existing \$30m line of credit to look to first and can go up to \$100m if need be. For many Banks this will cut profits from 25-50% at a time when capital is highly valued. Community Banks should not be burdened further by the errors of the large, systemically important institutions. Regular premiums have already been raised to between 12 to 16 basis points and another 20 basis points will just take another chunk out of earnings at a time when government is pressuring Banks to increase lending. Utilize established channels before you create new, damaging ones. Our Bank has taken aggressive steps to reduce expenses in many areas to ensure that we remain a well capitalized Bank. This special assessment would simply wipe out all the sacrifice made by many people to achieve these efforts.

Think about what you are about to do. Analyze it. Then, don't do it! Ken Zilka

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