
From: Jim Williams [mailto:arkitect7@sbcglobal.net]
Sent: Saturday, March 07, 2009 6:14 AM
To: Comments
Subject: RIN number 3064-AD35

March 6, 2009

RE: RIN number 3064-AD35

Dear Sir and Madam:

I vehemently object to the proposal to penalize the healthy banks, thereby making them unhealthy, for the irresponsible management of the unhealthy banks.

The model of the smaller, community or regional bank simply is more effective over time than the model of the giant national bank.

Management by families and/or local boards of directors, who have the best interests of their communities at heart, is, obviously, simply better than management by distant boards of directors, who seem to have their own individual personal interests at heart.

This proposal would cost some of these smaller, healthy banks their ENTIRE annual profit margins, thereby eliminating their incentive to even be in business.

This proposal would cost our bank an additional approximately \$7.8MM in increased FDIC premiums, while our consistently low lending losses simply do NOT support that kind of increase.

Why should the small, healthy banks subsidize the further rescuing of the "mega-banks," while executives of "rescued" banks and financial houses pay themselves bonuses of as much as \$33MM in the case of one individual CEO?

This proposal is OUTRAGEOUS!

Sincerely, but SERIOUSLY, folks,

Jim Williams, AIA
Facilities Manager
Amarillo National Bank