From: Deborah Kreusch [mailto:deborah.kreusch@cantoncoopbank.com]
Sent: Thursday, April 02, 2009 8:06 AM
To: Comments
Subject: Assessments,RIN 3064-AD35

Dear Madam or Sir,

The FDIC special assessment of 20 basis points, with the potential for more, unfairly shifts deposit insurance risk to banks that have little to no risk-somewhat inconsistent with the risk based initiatives of deposit insurance reform. A flat assessment can be interpreted to suggest that all banks are equally culpable for the state of the deposit insurance fund and are equally responsible for protecting much riskier institutions. Some financial institutions are clearly seen by the governmental agencies to be more important than others and have received massive government assistance. Mega profits made by insured depository institutions in recent years through unsafe and unsound lending practices have given way to the current state of the deposit insurance fund. These "highly rated" banks built an unsustainable engine that stripped equity from their institutions, and led to rapid descent into financial trouble. Additional stress is placed on the fund though the immediate, yet perhaps temporary, increase in deposit insurance limits, with further stress on the fund through the temporary liquidity guarantee program. These programs are biased toward larger institutions, and essentially those with more current risk. The burden should not now fall on those that maintained high lending standards with a traditional approach to lending-that does not sound like deposit insurance "reform". Assigning blame is ineffective at this point, but there is an effective inequity in the current 132 page final rule.

Deborah Kreusch
President &CEO
Canton Co-operative Bank
671 Washington St
Canton, MA 02021
781-828-8811