
From: Jim Thielen [mailto:JimT@mylsb.com]
Sent: Thursday, April 02, 2009 9:37 AM
To: Comments
Subject: Special Assessment Comments

To Whom It May Concern:

It would seem rather inequitable that the banks most responsible for the "main street economy" would be penalized because of the often times unethical and uncalled for actions of the mega banks and financial services companies. The majority of community banks did not participate in the risky practices that have led to this economic crisis. Unfortunately, the FDIC and Congress appear to be ready to place the burden of this mess on the community banks that have been a bright spot in this whole mess.

Typically, the community bank is well capitalized, sensitive to the needs of our communities and managed in an appropriate manner to meet the needs of main street America. This special assessment jeopardizes the ability of those banks that have contributed nothing to the "risks" of the economy to further our "economic mission" and aid in the recovery.

Any assessment should be assessed on a risk basis, in order to insure that those banks that caused the problem bear a larger burden to pay for it. If assessed against our bank, it is estimated that the special assessment would equate to approximately, 23% of the net income we had in 2008. Such an assessment would not reflect the risk associated with the management and operation of this bank. It truly would constitute a punitive action when we did nothing to warrant such.

Rather than take a carte blanche approach to this problem I would urge the FDIC to explore alternatives for funding the FDIC Fund which maximize the ability for the FDIC to borrow from the Treasury. Further I would urge the use of a systemic risk premium, so those banks that exhibit significant risk and have contributed to this mess bear the burden of the "cost" of this program.

Thank you for your consideration.

Sincerely,

James E. Thielen, JD
1st Vice President and Senior Trust Officer
Lincoln Savings Bank
242 Tower Park Dr.
Waterloo, IA 50701
319-233-1900