From: Robert Clarke [mailto:robert.clarke@firstcb.com]
Sent: Thursday, March 05, 2009 7:30 AM
To: Comments
Subject: 20 cents special assessment

Stop hitting banks when we're down. First, examiners get "tougher" during hard times making matters worse and now FDIC premiums are proposed to increase at the worst possible time. This will reduce our income by 25% in 2009 (and the capital we would otherwise retain) at a time when we need to retain earnings to build capital and loan loss reserves. My suggestion – cut the request to 10 cents, borrow the balance (US Treasury) and allow banks to pay this over an extended period of time. It would also be wonderful to recognize "too big to fail" and stop penalizing community banks. Separate the FDIC funding into two funds, one for true community banks and one for the "too big to fail" group and then charge for the real risk they (the big banks) represent, which we now more fully understand.

Robert W. Clarke, Chairman/President/CEO
First Community Bank
200 East Main Street
Harbor Springs, MI. 49740
e-mail: robert.clarke@firstcb.com
Telephone: 231.526.2114; Fax: 231.526.9575