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The FDIC's recent decision to implement a one time assessment of 20 basis points will place an unwarranted burden on small to intermediate size community banks. These banks have in no way contributed to the current crisis. The impact on earnings in a year in which banks are experiencing significant problems in transitioning from an expanding economy into a recessionary economy will be devastating. A 20 basis point assessment may very well create additional concerns among the general public as to the solvency of the industry. At the very least, if a 20 basis point assessment is necessary, it needs to be spread over a three to four year period rather than being absorbed entirely within the current year.

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