From: Stephen Lange Ranzini [mailto:ranzini@university-bank.com]
Sent: Thursday, April 02, 2009 7:13 PM
To: Comments
Subject: Assessments, RIN 3064-AD35

Dear FDIC:

It is my opinion that:

1) A special assessment should be levied on the total assets of each bank excluding all assets not NOT already insured. This will level the playing field for smaller FIs who did not do stupid things and penalize too large "Too Big To Fail and Collapse in an Uncontrolled Way" (TBTF&CINAUW) banks which caused the problem and are too big to be managed (TBTBM).
2) If you don't like #1, assess the special assessment on total assets. This will penalize the TBTF&CINAUW banks.
3) Normal FDIC premiums should be much, much higher for TBTF&CINAUW banks even any of them that are actually healthy as the collapse of any of them would destabilize the FDIC fund, and going forward we need to give them an incentive to break-up and fracture into smaller pieces that are not TBTF&CINAUW or TBTBM.
4) A special assessment on all banks is "unsafe and unsound" government policy during a depression and the money would be better borrowed than charged to the banks themselves.
5) The fees from the debt guarantee program should go to the general FDIC insurance fund.

Regards,

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