

March 31, 2009

Mr. Robert Feldman, Executive Secretary Attention: Comments Federal Deposit Insurance Corporation 550 17th Street N.W. Washington, D.C. 20429

Reference: RIN3064-AD35

To Whom It May Concern:

Please accept the following as our comments as it relates to FDIC's recently issued interim rule calling for a special assessment of 20 basis points.

The prospects of such an assessment, for smaller community banks such as our (\$100,000,000.00 in total assets), will have a significant affect on bank earnings that could potentially represent as much as a 10 percent reduction in annual earnings overall. It will not only create a loss of local revenue but will furthermore directly affect the funds we have available to lend.

With the prospects of a decline in earnings, following such an assessment, smaller community banks, and our included, will unfortunately face the prospects of reducing staff and employee benefits.

Additionally, such an assessment will have an impact on how community banks view deposit relationships. It will cause a banking institution to become less aggressive in seeking deposit relationships from customers and in turn, less accommodative to deposit customers overall.

A proposed assessment of this type will prove to be very unfortunate for community banks. We strongly encourage your staff to seek other alternatives in funding the assessment in question.

Sincerely,

Mike Brewer President

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