
From: Janet Rogers [mailto:janet.rogers@vgsb.com]
Sent: Thursday, March 05, 2009 6:49 PM
To: Comments
Subject: RIN 3064-AD35 Comment Letter on FDIC's Proposed Emergency Special Assessment

Sheila Bair and FDIC:

I am writing to voice my strong concerns with the special assessment that FDIC is planning to charge to FDIC institutions.

I am concerned that this assessment, along with the increased premiums, will serve to dip into already stressed bank earnings and possibly capital - at a time when we are supposed to be focusing on increased lending and stimulating our economy. We have been taking aggressive steps to reduce expenses in order to ensure that we remain strongly capitalized, provide consumer protected services, and provide a fair return for our shareholders. An assessment of this magnitude will certainly negate these efforts and more. This seems to be a self-defeating approach that appears to be a snowball probability.

I certainly do not see the special assessment approach doing anything to "stimulate spending." Who do you think is going to end up paying these assessments? Will we not need to pay as much as possible on to our consumers to try to stay afloat ourselves? Wouldn't a deferred and installment plan approached better serve the big picture here?

Why would you not want to consider turning to the Treasury line of credit as opposed to potentially sending more banks into failure? Did this not work during the S & L bailout? History does repeat itself - doesn't it! Some of us did learn from our mistakes, but here we are being asked to pay for those that didn't - once again.

I also do not understand how these big institutions were allowed to get to this point. Do we not have regulatory supervision? This problem has been in the works long enough that someone should have been paying attention to the "too big to fail" institutions, long before we "working class" institutions should be expected to bail them out. Of course, these assessments could be enough to send some of us little guys over the edge - but guess what - the "too big to fail" won't be around to bail us out.

I understand the problem; but I cannot see this as the best possible solution.

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