



March 25, 2009

Mr. Robert E. Feldman
Federal Deposit Insurance Corporation
5501 17th Street, N.W.
Washington, D.C. 20429

Attention: Comments

RE: 12 CFR Part 327; RIN 3064-AD35; Assessments

Dear Mr. Feldman:

Brazos Valley Bank, N.A. appreciates the opportunity to comment on the Federal Deposit Insurance Corporation's (FDIC) interim rule that proposes the imposition of a 20 basis point emergency special assessment (under 12 U.S.C. 1817 (b) (5)) on June 30, 2009. We understand the importance of having a financially sound FDIC insurance fund. We are aware that Bank premiums, and the earnings on those premiums have been the sole source of funding contributions to the fund since the FDIC was created 75 years ago. Community banks have been, and continue to be, prepared to meet our obligation to keep the FDIC insurance fund strong, but we are concerned about how the fund will be restored. We do not believe banks like us should be punished for a housing bubble caused by irresponsible lenders and borrowers and exacerbated by Wall Street.

The following quote by Camden R. Fine, president and CEO of the Independent Community Bankers of America (ICBA) said it best, "How ironic that on the same day that Citi is getting its third bailout from the government in six months, community banks are being kicked in the teeth by sharply higher FDIC assessments. The largest financial institutions are the ones that destabilized our economy. It is regrettable that the FDIC has decided to levy such a heavy burden on Main Street banks to indirectly pay for the economic wreckage caused by the incompetence and greed on Wall Street."

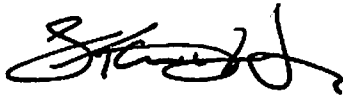
As a community bank, we are a common-sense lender that has played by the rules, yet we are being asked to shoulder a disproportionate share of the premium to rebuild the deposit insurance fund, due to the structure of the assessment base. We propose that the FDIC change the structure of the assessment base and a systemic risk premium be levied on the

too-big-to-fail institutions that helped trigger the problems that led to the fund being depleted.

During the fourth quarter of 2008, community banks had the largest percentage increase in lending across the industry. For every dollar paid in premium assessments, a community bank's ability to make loans and support economic recovery will be reduced at least eightfold.

Brazos Valley Bank, N.A. appreciates the opportunity to comment on the interim rule to impose a 20 basis point emergency special assessment. We look forward to working with the FDIC to find alternatives that will recapitalize the fund without harming our banks.

Sincerely,



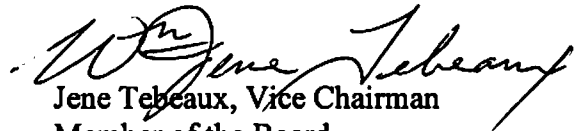
Steve Harper
President & CEO
Member of the Board



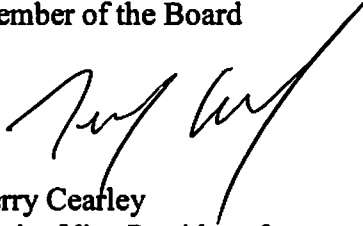
Bill Wantuck
Exec. Vice President & CFO
Member of the Board



Dr. Arthur Wright, Chairman
Member of the Board



Jene Tebeaux, Vice Chairman
Member of the Board



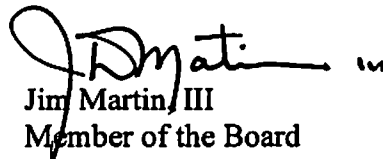
Terry Cearley
Senior Vice President &
Chief Operations Officer
Member of the Board



Clay Gerngross
Member of the Board



John Godfrey
Member of the Board



Jim Martin, III
Member of the Board