

March 26, 2009

Robert E. Feldman, Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

RE: RIN 3064-AD35

Dear Mr. Feldman:

This letter is being sent to convey concern at assessing Community Banks a premium increase along with a special assessment.

As a Community Banker, I understand the importance of a solvent Deposit Insurance Fund. The method being proposed to replenish the fund, however, defies common sense. Removing capital from an already crippled banking system in an irresponsible and shortsighted means to replenish the DIF. This action runs contrary to the objectives of Congress and the Treasury of injecting capital into the banking system through the TARP Plan.

The FDIC has the authority to borrow from the Treasury Department to meet its obligation to cover losses of failed financial institutions. I believe the FDIC should do so rather than weakening its strongest link – the Community Banks – by decreeing this special assessment.

Sincerely,



Robert D. Pfischner  
Chairman of the Board

RDP:dmc

cc: Cam Fine, President and CEO – ICBA  
Frank Pinto, President and CEO - PACB