195 W Court St
PO Box 677
Richland Center, WI 53581-0677

RICHLAND COUNTY BANK

"Where others Have their Branches,
We Have Our Roots"

Phone (608) 647-6306
Fax (608) 647-3149
www.richlandcountybank.com

March 27, 2009

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

RE: Assessments, RIN 3064-AD35

Dear Mr. Feldman:

Community banks, which did not cause nor have any part in the economic crisis, should not be punished by paying special assessments to shore up the FDIC Insurance Fund.

We feel, as community bankers, the FDIC should levy a special assessment on the too-big-to fail banks, which are largely responsible for the financial and economic meltdown as a result of their excessive risk-taking and greed. We also believe the FDIC should tap into its line of credit with the Treasury. We would support an increase in the FDIC's line of credit from the current $30 billion to $100 billion.

If we are to be assessed, we would strongly urge the FDIC to assess premiums on the basis of total assets (minus tangible capital) rather than domestic deposits, which would rightfully place greater responsibility on the TBTF banks, and give the banks the option to spread any special assessments over four years.

Sincerely,

RICHLAND COUNTY BANK

J.L. Davis, President

CC: The Honorable Russ Feingold
The Honorable Ron Kind