



March 23, 2009

SERVING LINN, CHARITON, MACON & RANDOLPH COUNTIES

Robert E. Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, N.W.  
Washington, D.C. 20429

100 S MAIN ST. USA  
MARCELINE, MO 64658

Dear Mr. Feldman:

As a community banker I am very concerned about the impact of the proposed special assessment and future assessments on this and other community banks. I hope that banks can continue to fully fund the DIF without taxpayer assistance other than the possibility of loans from the U.S. Treasury. I would prefer to see the proposed emergency assessment spread over a longer period of time, to reduce the impact on income statements.

In my opinion the most important consideration at this time is the basis for calculating F.D.I.C. premium and assessment amounts. F.D.I.C insurance premiums and assessments should be based on assets rather than on insured deposits. The risk to the DIF relates to deterioration in the value of assets irrespective to the funding source used to acquire these assets. I propose that premiums and assessments be based on total assets less capital.

For years the "to-big-to-fail" mega banks have enjoyed the benefits of the implied guaranty of all deposits without paying even a fair share of the cost of deposit insurance. If banks are considered to be "systemically important" their premium should be large enough to pay for the substantial risk of insuring these "to-big-to fail" institutions.

I strongly support continuation of the \$250,000 per depositor insurance coverage.

Thank you for your consideration in these matters.

Sincerely,

Don Reynolds  
President

CC: Sam Graves, U.S. House of Representatives  
Kit Bond, U.S. Senate  
Claire McCaskill, U.S. Senate