Perryton
National
Bank

March 24, 2009

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

Re: RIN 3064-AD35

Dear Mr. Feldman,

I think John McEnroe said it best, "You cannot be serious!" I am a community banker in a small town in the Texas Panhandle. This bank was established in 1919 and has been successful in meeting the credit needs of our community and providing an acceptable return on our stockholders' investments for all those years.

I was shocked to read of the original FDIC 20-basis-point emergency special assessment under 12 U.S.C. 1817 (b)(5) on June 30, 2009. The FDIC has since lowered the special assessment, but it will still have a significant impact on our earnings. Here are our estimates on the revised 10-basis-point special assessment on our bank:

2008 FDIC and FICO actual assessments on the
Perryton National Bank =... $ 25,788

2009 FDIC and FICO projected assessment on the
Perryton National Bank:
Deposits - $115,000,000 @ $0.12 per $100 =........................ $138,000
Special Assessment - $115,000,000 @ $0.10 per $100 =.......... $115,000
FICO =... $ 12,000
Total =.. $265,000

That is still a 928% increase for a bank that, according to Uniform Bank Performance Reports, is very well run and maintains strong capital ratios. As of the 12-31-08 call report, the Perryton National Bank reported Tier 1 Leverage Ratio at 10.82%, Tier 1 Risk Based Capital Ratio at 24.32%, and Total Risk Based Capital Ratio at 25.08%.

The special assessment will have a number of adverse effects, not only on the bank's shareholders, but also on the employees and community. Personnel will be cut and salaries will be reevaluated. Planned capital expenditures and IT investments will be postponed. Community support will be curtailed or withdrawn.

This bank was already trying to absorb the recently enacted 7-basis-point "across the board" increase in our FDIC premium. That 7-basis-point increment alone will result in more than a 100% increase over our previous FDIC assessment.

FDIC insurance premiums should be based on risk. Banks that do not want to pay high FDIC insurance premiums should avoid the higher risk categories. Banks with strong capital and little risk should be exempt from the special assessment. If the regular risk-based assessment base continues to be used, more credit should be given to well run, well capitalized banks.

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One of the biggest mistakes the FDIC, and all bank regulators, have made is to allow banks to get "too big to fail." When a bank reaches that status, it really does not have to answer to any regulator.

Since FDIC believes "that it is important that the fund not decline to a level that could undermine public confidence in federal deposit insurance," I want to remind you that according to the FDIC web site, "FDIC insurance is backed by the full faith and credit of the United States government." Hopefully, it does not get any better than that.

Thank you for allowing me to make these comments.

Sincerely,

Douglas W. Hale
President and CEO