

With New Jersey Banks, New Jersey Prospers

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Chairwoman Sheila Bair 550 17th St., NW, Room 6028 Washington, DC 20429

Dear Chairwoman Bair,

We are writing you today to express the New Jersey Bankers Association's concern with the FDIC's decision to move forward with a special emergency assessment to replenish the FDIC fund. While we applaud your willingness to compromise from the originally proposed 20 basis point assessment, to 10 basis points provided that Congress passes legislation expanding the FDIC's line of credit with Treasury to \$100 billion, our concern for the immediate effects remains.

As you know, many banks face narrowing profit margins due to the unprecedented economic downturn. This assessment comes at the most inopportune time. For some of our members, even the scaled back assessment will consume an entire quarter's earnings. This is occurring at the same time that the federal government is pumping capital into the system and encouraging banks to lend. Furthermore, an increased assessment adds another stress to banks that are less than well capitalized. This is counterproductive.

We agree that maintaining the solvency of the Bank Insurance Fund is critical to providing assurance to depositors that their deposits are safe, but believe that pursuing a gradual ramping up approach is more desirable. This approach would allow banks to plan for the assessment and weather the current storm without an overly burdensome assessment.

We look forward to working with you and thank you for reaching out and engaging with the banking community to seek bankers' views on this very important issue.

Sincerely

James R. Silkensen

Co-President/Co-CEO

John E. McWeeney Co-President/Co-CEO

^{*}The new New Jersey Bankers Association, formed by the 2009 combination of the New Jersey Bankers Association, founded in 1903, and the New Jersey League of Community Bankers, founded in 1908, is a trade association representing 118 of New Jersey's commercial banks, savings banks and savings & loan associations. The NJBankers' wholly-owned subsidiary, T.I.C.I.C., assists NJBankers' members in forming consortiato make loans on low-to-moderate income housing and economic development projects throughout New Jersey. Since its founding in 1991, T.I.C.I.C. has closed \$410 million in loans to create over 5,750 units of housing affordable to families, senior citizens and citizens with special needs. In addition, TICIC's loan pipeline will create further residential units to serve the needs of communities throughout the state.