



July 21, 2009

VIA E-mail: comments@FDIC.gov

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

Dear Mr. Feldman:

This letter is submitted on behalf of UMB Bank n.a. and its affiliates. Contained herein, UMB provides commentary on the Federal Deposit Insurance Corporation's (FDIC's) Notice of Proposed Rulemaking regarding the phase out of the Transaction Account Guarantee Program (TAGP).

UMB appreciates the opportunity to reflect on this important topic, as well as the careful consideration extended by the FDIC to ensure stabilization of the financial industry. We believe the TAGP has served its purpose. It has increased consumer confidence in the financial industry and mitigated core deposit flows from large depositors at smaller financial institutions whom might otherwise believe that their deposit would be safer with a larger financial institution that is "Too Big to Fail."

While UMB respects the FDIC's decision to enact the TAGP effective December, 2008, based on the turbulent state of the financial industry at that time; we oppose any extension of this program beyond the initial termination date of December 31, 2009. Any continuation of the TAGP would be unfair to banks, like UMB, that have operated responsibly and continue to maintain strong liquidity and capital standards.

Should there be a continuation of the TAGP, we ask that you please consider risk-based premiums, passing a higher assessment to at-risk participating financial institutions. It would seem feasible that an at-risk financial institution should bear the proposed 25 bps premium while stronger participating financial institutions could continue under the current 10 bps premium. This would encourage extended participation from banks, like UMB, that do not necessarily require the additional deposit insurance but would continue participation to benefit the financial industry as a whole.

UMB, in the first half of 2009, has contributed \$427,235 as a participant in the TAGP. We viewed our participation in the initial TAGP as a competitive must; however, we will strongly consider opting out of future extensions should risk-based pricing fail to be a component.

UMB Bank

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Member FDIC



UMB is a strong and stable financial institution that experiences growth in both good and turbulent economic times based on calculated risks, not blind ones, built on relationships that we develop and maintain with our customers. We have strong underwriting practices and adhere to our credit quality standards. We are a reliable, credible steward that responds to the needs of our customers. Our timeless, regional business philosophy works. We offer our customers consistency, stability and security – important at all times but especially now. UMB is mindful of our role as a responsible steward and we operate with the highest integrity. It is our desire that you will keep these principles in mind as you establish future policies and programs. This behavior should be encouraged and rewarded.

Sincerely,

A handwritten signature in black ink that reads "Peter J. deSilva". The signature is written in a cursive style with a large, prominent initial "P".

Peter J. deSilva
Chairman and CEO
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