From: Carl Dodson [mailto:cdodson@johnmarshallbank.com]
Sent: Wednesday, March 04, 2009 10:12 AM
To: Comments
Cc: info@icba.org
Subject: RE: Assessments, RIN 3064-AD35

I am writing to express my strong opinion that the proposed 20 basis point special FDIC insurance assessment is inherently unfair to well run community banks such as ours.

We are a very well capitalized, well run de novo bank that was on the way to profitability this year. The proposed assessment, if enacted, will eliminate the possibility of profitability this year, and could have a negative effect on our CAMELS rating during our next exam, thus increasing our FDIC insurance assessment rate – a potentially vicious circle. Isn't it ironic that the FDIC special assessment will likely weaken otherwise strong banks - and will certainly weaken de novo banks such as ours?

Frankly, the large, too-big-to-fail banks, who got us all into this mess in the first place, should pay for this. Their senior executives, directors, and shareholders, should suffer the consequences. I can assure you that if a community bank board or senior management team ran their banks into the ground, we would suffer extreme civil and monetary penalties.

Don't make the strong, well run community banks, who had nothing to do with this mess, suffer. Our shareholders and employees don't deserve to suffer these consequences.

Respectfully,

Carl Dodson
EVP - Chief Operating Officer