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**From:** Info [mailto:info@wvsvbank.com]  
**Sent:** Wednesday, October 21, 2009 9:15 AM  
**To:** Comments  
**Cc:** DAVID J BURSIC; 'Jonathan Hoover'  
**Subject:** RIN 3064-AD49

October 21, 2009

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

RE: Prepaid Assessments, RIN 3064-AD49

Dear Mr. Feldman:

I have been an employee of West View Savings Bank for 29 years and we have always strived to operate this Bank in a sound and fiscally responsible manner. I am very proud of the financial position that this bank has attained through strong leadership.

I feel that banks like ours, small community banks, have not caused the problem of the drain on FDIC insurance. We have paid more than our fair share and I am appalled at the proposed rule that is pending. It would require insured depositories to prepay their quarterly risk-based assessments for the fourth quarter of 2009, and for all of 2010, 2001, and 2012, on December 30, 2009, along with each institution's risk-based deposit insurance assessment for the third quarter of 2009. This high cost of FDIC insurance would cost this Bank approximately \$1,090,000.00, which is a large dollar amount to absorb.

I am very aggravated with the FDIC and their continual taking of money from banks that are fiscally sound. In private sector businesses whenever a company cannot make budget, cuts are made. I have not seen any attempt by the FDIC to make any cuts.

Those that caused the problem should bear the cost, not strong community banks.

There is a very obvious solution to the FDIC dilemma of being under funded. Use the treasury's Line of Credit to restock the FDIC fund. The government has gone out of its way to help many industries, such as the auto industry, and provide billions of dollars to "Bail them out". Why not use the Line of Credit issued to the FDIC as it is intended, not burden banks again, especially those that are financially strong.

Another solution to ease the cost to banks would have the FDIC mandate that all Banks charge each deposit account an "FDIC Insurance Premium Charge". In the past I noticed that a large local bank tried this, however, with no other banks charging their

accounts, it was short lived. If all banks were mandated to charge this premium, it would soften the blow of the large insurance assessment.

Sincerely,

Bernard P. Lefke  
Vice President  
Savings Administrator