

# BankSouth

March 9, 2009

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

Re: Assessments, RIN3064-AD35

Dear Mr. Feldman,

I am writing on behalf of BankSouth, a community bank located in Central Georgia, serving the needs of the citizens of Greene County, for over 60 years. The special assessment now being considered would have a severe impact on the financial well-being of most small community banks around the country. The direct impact to our earnings would be between 10% and 19% depending on the level assessed.

We would be forced to pass on a portion of the assessment in the form of lower interest rates paid on deposits, which at this time could drive our customers to a higher yielding, but much less secure investment. Also, with less funding as a result, investment in our community could be damaged by less lending ability.

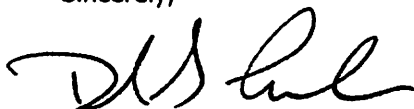
I would also ask that pressure be mounted to change accounting rules so that any assessment levied could be amortized over a period of years.

Community banks have long been the backbone of our country's financial well being, yet we are being penalized by paying assessments that will be more than doubled from last year. Community banks did not participate in the risky practices that led to our economic crisis and continue to be well-capitalized. We stand ready, willing, and able to help in the economic recovery process, but this special assessment would limit our ability to do so.

Let the community banks continue to serve their communities by paying fair rates and lending money for community improvement and reconsider the many alternatives of funding Thanks! Deposit Insurance Fund such as using existing authority to borrow, both from the Treasury and the banking industry, and issuing debt instruments.

Thank-you for your consideration.

Sincerely,



David S. Cowles  
SVP and Chief Operating Officer

cc: Senator Saxby Chambliss  
Senator Johnny Isakson  
Congressman Paul Broun

1947  
1948  
1949  
1950  
1951  
1952  
1953  
1954  
1955  
1956  
1957  
1958  
1959  
1960  
1961  
1962  
1963  
1964  
1965  
1966  
1967  
1968  
1969  
1970  
1971  
1972  
1973  
1974  
1975  
1976  
1977  
1978  
1979  
1980  
1981  
1982  
1983  
1984  
1985  
1986  
1987  
1988  
1989  
1990  
1991  
1992  
1993  
1994  
1995  
1996  
1997  
1998  
1999  
2000  
2001  
2002  
2003  
2004  
2005  
2006  
2007  
2008  
2009  
2010  
2011  
2012  
2013  
2014  
2015  
2016  
2017  
2018  
2019  
2020  
2021  
2022  
2023  
2024  
2025

1947  
1948  
1949  
1950  
1951  
1952  
1953  
1954  
1955  
1956  
1957  
1958  
1959  
1960  
1961  
1962  
1963  
1964  
1965  
1966  
1967  
1968  
1969  
1970  
1971  
1972  
1973  
1974  
1975  
1976  
1977  
1978  
1979  
1980  
1981  
1982  
1983  
1984  
1985  
1986  
1987  
1988  
1989  
1990  
1991  
1992  
1993  
1994  
1995  
1996  
1997  
1998  
1999  
2000  
2001  
2002  
2003  
2004  
2005  
2006  
2007  
2008  
2009  
2010  
2011  
2012  
2013  
2014  
2015  
2016  
2017  
2018  
2019  
2020  
2021  
2022  
2023  
2024  
2025

1947  
1948  
1949  
1950  
1951  
1952  
1953  
1954  
1955  
1956  
1957  
1958  
1959  
1960  
1961  
1962  
1963  
1964  
1965  
1966  
1967  
1968  
1969  
1970  
1971  
1972  
1973  
1974  
1975  
1976  
1977  
1978  
1979  
1980  
1981  
1982  
1983  
1984  
1985  
1986  
1987  
1988  
1989  
1990  
1991  
1992  
1993  
1994  
1995  
1996  
1997  
1998  
1999  
2000  
2001  
2002  
2003  
2004  
2005  
2006  
2007  
2008  
2009  
2010  
2011  
2012  
2013  
2014  
2015  
2016  
2017  
2018  
2019  
2020  
2021  
2022  
2023  
2024  
2025