

**From:** Bonnie Kankel [mailto:bkankel@ibat.org]  
**Sent:** Wednesday, July 29, 2009 4:33 PM  
**To:** Comments

Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation

**RE: RIN # 3064-AD37**  
12 CFR Part 370  
Notice of Proposed Rulemaking Regarding Possible Amendment of the Temporary Liquidity Guarantee Program To Extend the Transaction Account Guarantee Program With Modified Fee Structure.

The Independent Bankers Association of Texas, representing over 2,000 community banks and branches in Texas, appreciates the opportunity to comment on the alternatives for phasing out the Transaction Account Guarantee (TAG) component of the Temporary Liquidity Guarantee Program.

The TAG program has successfully improved public confidence and encouraged depositors to retain large balances with their community banks. However, people are still uncertain about the economy, and their confidence in financial institutions has not returned to acceptable levels. We believe that termination of the TAG program on December 31, 2009, could cause a loss of accounts at community banks and impair their funding structure. For these reasons, we believe that community banks should have the option to participate in the TAG at least until June 30, 2010.

Texas community banks neither participated in nor profited from the absurd excesses that contributed to the present economic malaise or the wane in consumer confidence in financial institutions. However, they are still paying a heavy price, with increased deposit insurance premiums, stressed real estate markets, rising unemployment, an irrational deposit marketplace, strained net interest margins and anxious customers and regulators. While we appreciate the FDIC's consideration of extending the TAG program, we strongly urge you to continue charging the annualized rate of 10 basis points on deposits in the non-interest bearing transaction accounts.

We applaud the FDIC for the success of this program, and hope that the FDIC will continue it for at least another six months while the economy and consumer confidence in financial institutions continue to recover.

Again, thank you for this opportunity to comment, and if you have any questions regarding our comments, please do not hesitate to call me.

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