



FIRST FEDERAL SAVINGS and Loan Association of Delta

March 9, 2009

Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429-9990

RE: Assessments – Interim Rule – RIN 3064-AD35

Dear Mr. Feldman:

Regarding the special 20 basis point assessment of June 30, 2009, I would like to voice my stringent disgust with the proposal.

Where are the problems originating that caused the current crisis? My guess is the institutions that are getting the "TARP" funds, so in essence government bailout money is already in play for this special assessment. Why did the FDIC increase insurance on accounts to \$250,000 when we couldn't afford the coverage in the fund? Once again, the small community banks are being charged for bad decisions made not only by the large risk taking financials but the FDIC as their partner. Your lack of oversight and regulation is a budget buster for the community banks. This assessment will cost us half of our budgeted income for the year.

Perhaps a more fair way to recapitalize the fund is to take a longer period of 10 to 12 years and increase the assessment rate for the poorly run, high risk institutions. It gets to be the same old story, conservative run community financials pick up the pieces of the broken poorly run high risk financials. What financial incentives are you offering to well run institutions? There must be a way to punish the ones that cause the problems or there are no consequences for bad behavior.

In summary, find another way to fix your mistakes that do not punish the ones that had nothing to do with creating the problem.

Sincerely,

James E. Coe
President

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