

March 6, 2009

Mr. Robert E. Feldman **Executive Secretary** Federal Deposit Insurance Corporation 550 Seventeenth Street, NW Washington DC 20429

RE: FDIC Special Assessment Response

Dear Mr. Feldman,

Thank you for the opportunity to comment on the FDIC's interim rule to add a one-time special assessment of 20 basis points in the second quarter of 2009. While the FDIC needs to rebuild funds to insure consumer deposits and maintain confidence, we believe this assessment would be excessive, burdensome and counterproductive to the efforts of healthy community banks in good standing, such as First Resource Bank and others. For the following reasons, we feel the FDIC should carefully reconsider the potential long-term negative consequences of this action.

- Imposing higher deposit insurance premiums would force us to decrease interest yields on deposits. This would lead to more concerns about how to raise new deposits.
- Reduction in earnings would make it harder to build capital when we need it most for business lending in the community.
- The proposed assessment would also considerably hinder our efforts to help Chester County homeowners meet consumer credit needs.
- Reduced earnings would cause us to further limit expenses, including community sponsorships and charitable donations, many of which are organizations we have faithfully supported since we opened our doors 4 years ago.
- The impact of this FDIC assessment would affect every area of our community and it would be potentially harmful and an unfair burden to a healthy bank like ours at this critical time; while we are engaged in our most earnest efforts to help our local communities toward economic recovery.

This assessment matter is especially important to our bank and the Chester County community at this particular time, since it will reduce the opportunity to build capital to support local lending activities in this economic downturn.

Therefore, we strongly urge you to consider more reasonable alternative funding options when the Board meets in April.

Sincerely,

Glenn B. Marshall

President & CEO

First Resource Bank

cc: Senator Robert P. Casey Jr.

Senator Arlen Specter

Representative Jim Gerlach