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To: Comments

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Subject: Special Assessment

As an independent community bank we strive to meet and exceed the needs of our customers in the communities we serve, we place great value in being a good corporate citizen in the communities we serve, we place high value on our employees and the value they bring to meeting the needs of our customers and we strive to bring a fair return to our shareholders. This is how we function on a daily basis and is the order of our priorities; serving first and profits second. This is what has kept us from entering into more risky activities and has kept us a "safe" financial institution. This is also a large reason why the communities we serve have been and continue to be vibrant even amid the current economic challenges.

"Main Street" America is doing ok. "Wall Street" America is not. Yet the difference to date has not been totally acknowledged by our legislators or regulators. The proposed special assessment of 20 basis points for June 30, to be collected September 30, 2009, and authorized by the FDIC yesterday appears once again to use the "Broad Brush" approach to determine the special assessment. This "Broad Brush" approach has been used by legislators and regulators for decades and it is wrong. One size does not fit all. "Too big to fail" is real, institutions have carried different levels of risk on their balance sheets and our financial system needs to recognize and acknowledge this. Independent community banks have been at a competitive disadvantage for decades due to the "Broad Brush" approach used by both legislation and regulations. Now this philosophy appears to have expanded to the FDIC assessments as well. Don't do this to us. We have not caused the problem, we are not part of the problem and it is unfair to ask us to disproportionately be part of the solution. During the S & L failures two insurance funds were established; the SAIF and the BIF. Perhaps it is time to consider two funds once again; one for the mega banks, MBIF and one for the community banks, CBIF so that community banks are not disproportionately assessed for insurance premiums.

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