

March 10, 2009

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments, Federal Deposit Insurance Corp.
550 17th St., N.W.
Washington, D.C. 20429

Dear Sir,

We wish to comment on the FDIC 20 Basis Point Special Assessment on all Domestic Deposits.

We are a community bank and we have been successful in all kinds of economic environments since 1906. We are conservative and help our local community with loans and deposit opportunities.

We feel that the proposed 20 or 10 basis point assessment on all deposits will have a negative affect on our earnings at a time when we need to do everything possible to provide loans and support for our local communities. We would have to raise our fees to offset this assessment, and our customers will have to pay more for banking activities. This comes at a time when our economy needs a boost, not more fees.

Our FDIC assessment last year was around \$35,000.00, our proposed assessment this year at 20 basis points would be \$200,000.00. We feel this would be an unfair assessment on community banks, since we did not participate in the risky practices that led to the economic crisis that we are now experiencing.

We think a more fair assessment should be based on total assets (minus tangible capital), not total domestic deposits, so that banks that caused the problems pay a bigger share.

If an assessment is administered, we support a change in the accounting rules to allow banks the opportunity to amortize the special assessment over a period of years.

We also support a systemic-risk premium for the large, "systemically important" banks. This premium should be large enough to pay for the substantial risk of insuring these institutions.

We urge the FDIC to explore all alternatives for funding the Deposit Insurance Fund in lieu of the special assessment. There are many alternatives in funding this, including

borrowing from the treasury, issuing debt instruments to the public or using its authority to borrow from the banking industry.

We hope that you consider some of the above comments and we appreciate the opportunity to respond to the very important proposal.

Respectfully, The Board of Directors The Roscoe State Bank Roscoe, TX. 79545

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