

# SOYCAPITAL



SOY CAPITAL BANK AND TRUST COMPANY  
217-428-7781

March 11, 2009

Mr. Robert B. Feldman  
Executive Secretary  
Attn: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Re: RIN 3064-AD35  
Comment Letter on FDIC's proposed Emergency Special Assessment

Dear Mr. Feldman:

I appreciate the opportunity to express my concerns with the FDIC's special assessment of 20 basis points that has been proposed on deposits as of June 30. As an employee of community bank operating in Central Illinois I am amazed and disappointed by this special assessment during this time of great economic difficulty in our country. Our bank works hard to support our communities through active lending, philanthropy, and by employing over 175 Associates. This assessment, which is in addition to the increased normal assessments, will increase our deposit insurance costs in 2009 by more than \$800,000 from 2008. This represents over 20% of our after tax 2008 income. If the FDIC implements this special assessment it will only cause us to cut expenses and work to raise revenue from our community bank customers to help offset this increase. This can only hurt our community and those that we serve.

The Treasury currently maintains a \$30 billion line of credit for use by the FDIC in extraordinary situations, and we understand that the FDIC is seeking to increase its line with the Treasury to \$100 billion. We also understand that there is consideration that if the increased line of credit is approved, the special assessment may be reduced to 10 basis points. While this is an improvement, it will still make things very difficult for community banks and the customers we serve. These are extraordinary times, and while the insurance fund needs to be solid, use of the line of credit should be strongly considered. To place the burden of immediately replenishing the fund with this special assessment on community banks will only cause greater problems. The industry can, and will, recapitalize the fund over an appropriate period of time.



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455 North Main • Decatur, Illinois 62523  
1685 South Franklin Street • Decatur, Illinois 62521

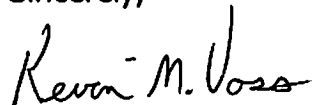
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1090 South Route 51 • Forsyth, Illinois 62535

Member FDIC

Also, I would suggest that the banks that have been assisted through TARP funds are the ones that should pay a greater share of any special assessment. By their acceptance of TARP funds it has been shown that they need additional capital as a result of their involvement in certain high risk business practices. In addition, the acceptance of TARP funds shows that they apparently have the ability to continue in business as determined through the oversight by their primary regulator. These are the banks that reaped the rewards from the higher risk business practices, and are now causing the tax payers and other more conservative institutions to shoulder their excesses in these bad times. This is another cost that they need to bear for their problems.

I respectfully submit these suggestions and appreciate the opportunity to share them with you and the FDIC Board of Directors.

Sincerely,

A handwritten signature in black ink that reads "Kevin M. Voss". The signature is written in a cursive style with a large, prominent 'K' and 'V'.

Kevin M. Voss  
Senior Vice President/Auditor