



July 30, 2009

Via Email at Comments @FDIC.gov

Mr. Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, D.C. 20429

Re: **RIN #3064-AD37**
NOTICE OF PROPOSED RULEMAKING REGARDING POSSIBLE
AMENDMENT OF THE TEMPORARY LIQUIDITY PROGRAM TO EXTEND
THE TRANSACTION ACCOUNT GUARANTEE PROGRAM WITH
MODIFIED FEE STRUCTURE

Dear Mr. Feldman:

Johnson Financial Group, Inc. ("JFG") is a \$6.2-billion financial holding company headquartered in Racine, Wisconsin, operating through several affiliated companies primarily in the states of Wisconsin and Arizona. Our product/service lines include banking, trust, and investment services (Johnson Bank), an insurance agency (Johnson Insurance Services, LLC), and branded brokerage and credit card services (with joint marketing partners).

We appreciate the opportunity to provide comments on the proposed extension of the Transaction Account Guarantee Program (TAGP).

The FDIC seeks comment on whether the bank has a preference for Alternative A, Alternative B or some other alternative as a means of providing an orderly phase out of the TAG program. Following are our comments.

Alternative A versus Alternative B

While we appreciate the FDIC's efforts to try to extend the TAG program beyond the current planned expiration date of December 31, 2009, we strongly support Alternative A which would preserve the current regulation and its planned expiration date of December 31, 2009. The banking industry is not experiencing the level of financial turmoil that was present at the time this program was implemented. The

proposed increase in fees that would accompany an extension of this program is not justified by the limited value that would be gained by the extension. **We strongly encourage the FDIC to allow the program to sunset as planned.**

We do not support extending the TAG program or giving banks the option to participate or not participate. Banks should be on a level playing field and not be put at a disadvantage if they choose not to participate in an extended program. Bank clients may not understand *why* a bank chooses not to participate in the program and may decide not to do business with a bank simply because it is not part of the TAG program.

As an aside, we believe that the extension of the \$250,000 in FDIC insurance coverage through December 31, 2013, is of much greater value to our clients than an extension of the TAG program. In addition, we suggest that the FDIC continue to promote public awareness of this extension of the increased coverage as a vital action to aid in the ongoing economic recovery.

Summary

We believe the Transaction Account Guarantee program is no longer necessary and should be allowed to sunset on December 31, 2009 as planned.

Thank you for the opportunity to comment on this proposed rulemaking.

Yours very truly,



John R. Topczewski
Vice-President & Compliance Officer

cc: Richard A. Hansen, President and CEO, Johnson Financial Group
Russell C. Weyers, President and COO, Johnson Bank
Kurt Bauer, Executive VP, Wisconsin Banker's Association