

From: Dan Combs [mailto:dcombs@fscb.com]  
Sent: Tuesday, March 17, 2009 10:52 AM  
To: Comments  
Subject: Opposition to RIN 3064-AD35: Proposed FDIC Special Assessment pursuant to 12 CFR Part 327

Executive Secretary Feldman:

Please consider possible alternatives to the one time assesment of FDIC fees on our financial institutions. It comes at one of the worst times as our customers are having difficult times making payments and declining loan demand. We need to consider allowing the fund to build better when times are good so we don't have to rebuild when times are bad. Many of the upstart banks that were started 5 to 10 years ago are the ones having the problems and since the DIF was fully funded they barely had to pay into the fund. That is wrong. Many new banks stretch the limits on the types of business they bring in hopes of becoming profitable faster. In good times that model works, in bad times that model is a disaster. Please consider allowing the DIF to re-build over a longer period of time as well as charging more for those institutions that are most at risk of failure.

Sincerely,

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