

From: Brent Zavalney [mailto:brentz@choicefinancialgroup.com]  
Sent: Tuesday, March 17, 2009 11:25 AM  
To: Comments  
Subject: Opposition to RIN 3064-AD35: Proposed FDIC Special Assessment pursuant to 12 CFR Part 327

Brent Zavalney  
President of Related Services  
Choice Financial Group  
210 8th Ave  
Langdon, ND 58249-2638

March 17, 2009

Robert E. Feldman  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429

Dear Robert Feldman:

I wish to offer comment on the FDIC interim rule that would create a 20 basis point special assessment to banks and our bank in particular. I understand that some discussion is occurring that may reduce the special assessment with an alternative payment plan. I have several issues relating to a potential assessment.

There are any number of words I could use to describe the complete unfairness of assessing our bank or any other bank which did not participate in unsound lending practices in order to subsidize those few large banks that did engage in practices that have lead to the current problems in our industry.

The proposed assessment certainly is a profitabilty issue for innocent banks but because of the affect on bank capital actually works against the flow of credit to credit worthy borrowers. The delay of credit obviously delays our economic recovery.

The assessment not only penalizes innocent banks but further penalizes innocent bank customers. Bank profits provide the industry with the funds to offer expanded products and services to customers which will likely be delayed due to the need to fund the assessment. Delaying the delivery of new products and services also hinders consumer and business transactions that would likely speed economic recovery.

The assessment will cause our bank to significantly limit support for community programs which rely heavily on us for survival. Programs in our rural communities that fail due to a lack of financial support may not be revived at a later date.

Given the impact that the proposed assessment will have on my bank and my

community, I strongly urge you to consider alternatives that would reduce our burden and provide the FDIC the funding its needs in the short term.

Sincerely,

Brent R. Zavalney  
701-256-2141  
President of Related Services  
Choice Financial Group