

**From:** Beth Lowery [mailto:blowery@bankofunion.com]  
**Sent:** Monday, March 16, 2009 9:34 AM  
**To:** Comments  
**Subject:** REFERENCE: RIN3064-AD35

Dear Mr. Feldman,

I am writing concerning the Special FDIC Assessment.

To get right to the point: This Special FDIC Assessment charged to all banks is unfair in the least! I'm sure you are or will be receiving many comments concerning this, so I will try to keep this brief.

I've been in compliance for 4 years (banking for 17 years), and the FDIC regulates a risk assessment for just about every regulation that is out there. The fact that this special FDIC assessment will be assessed to all banks is ridiculous.

I work at a community bank – we are the banks that did not get greedy and offer ANY subprime lending. We don't even offer Overdraft Protection. We are a conservative bank that serves our community well. We support our local schools, seniors, churches and our community.

Risk is a funny thing, you take more risk and either you yield a higher return or a greater loss. If a bank took and continues to take less, their risk should be less. Now I guess we're learning a new definition of risk. Some get to reap the greater returns when life is good, but we all get to help pay their losses?

What FDIC is proposing is that regardless of the fact that we played by the rules, we did not and do not take the big risks, doesn't matter, some banks did and now we need to pay our share in their loss?

There are other options, as a community bank, paying the Special FDIC Assessment, will surely affect our business. Does FDIC fully understand the unintended consequences to this special assessment? This will surely have an effect on community banks and the communities in which they serve! The communities in which they serve is where **people** live – it will effect these people.

One last point, I don't understand how FDIC doesn't better support the community banks? There are several different types of banks – the AIG's of the world are far different than the community banks. Who's job is it to inform the media that the bad publicity they have been spreading about 'the banking industry' is too broad?

Sincerely,

Beth A Lowery  
Vice President/Compliance  
Bank of Union