

**From:** Greg Warren [mailto:gwarren@fnbgranbury.com]  
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**To:** Comments  
**Subject:** FDIC RIN 3064-AD35

Thank you for the opportunity to comment on the Interim Rule imposing a 20 basis point emergency special assessment.

My comments to the six requests follow here:

1. Any special assessment should be far less than 20 basis points. Considering the FDIC has access to a line of credit at Treasury, the emergency need should be obtained from the funding facility already in place. Additionally, 20 basis points to all banks is extremely punitive to a bank line our which is well-capitalized and did not participate in the risky ventures that brought about much of the present market problems. I think special assess for a bank like ours should be zero, definitely no more than 5 basis points.

2. I understand part of the FDIC's problem is how much to assess a troubled bank that impacts the fund with greater risk. You also must admit that the "necessary" problem of allowing certain banks to be "to big to fail" simply by re-regulating the balance sheet or changing accounting rules to give value to valueless assets is also much of the problem if these banks are protected from increased assessments. But, back to the high risk banks, assessing them at a level which guarantees their demise seems unwise in the present scenario if the fund can be rebuilt from access to a line of credit.

3. My comments in #1 above make this question irrelevant.

4. If the fund insures only deposits then assessments should be based on the deposits insured.

5. No.

6. As I mentioned in #2 above, I understand the tension created in the U.S. financial system by the "necessary" existence of banks which are "to big to fail". However, pertaining to the risk posed to the insurance fund, these mega-banks did more to contribute to the present financial crisis than all other banks combined. Consequently, while I think they should be assessed the greatest, I realize they don't pose failure risk to the fund in the same sense that the remainder of the banks do.

In general, I think this proposed special assessment should just "drop off the radar." A well-capitalized bank such as mine should not be punished for deeds we did not commit and we should not be expected to "pay our fair share" for the condition of the industry that we did not help create.

Thank you,  
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Vice President  
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