

From: Duane Manier [mailto:dmanier@norwaybank.com]
Sent: Friday, March 13, 2009 10:01 AM
To: Comments
Subject: Opposition to RIN 3064-AD35: Proposed FDIC Special Assessment pursuant to 12 CFR Part 327

Duane Manier
Vcie President & Cashier
First National Bank of Norway
P.O. Box 218
Norway, MI 49870-0218

March 13, 2009

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

Dear Robert Feldman:

I very seldom comment on interim rules. I felt it necessary to voice my concern on this "special assessment" of 20 basis points in the second quarter.

I first wanted to emphasize that I fully support the view of the FDIC that we need a strong, financially secure fund in order to maintain the confidence depositors have in the system. However, how this is done is very important to my bank and my community. Banks like mine that never made a subprime loan and have served our community in a responsible way for over 100 years are being unfairly penalized. The cost of this assessment is so high that it is a disincentive to raise new deposits. On one side the Federal Reserve Bank is lowering rates to stimulate borrowing, on the other side the FDIC is raising rates. This will result in fewer deposits, lower margins, and will hinder our desire and ability to lend.

We will also be forced to look at ways to lower the cost of other expenses, which may limit our ability to sponsor community activities or make charitable donations - something that we have done year after year. This action may be perceived as a sign of weakness and thus concern from our community. The implications of this significant FDIC charge will impact every corner of my community. It is patently unfair and harmful to burden a healthy bank like mine that is best positioned to help our community and economy recover.

Please, do not allow politics and current regulations to dictate over common sense. These are difficult times that require common sense changes, not arbitrary application of inappropriate regulations. I urge you to consider more reasonable funding options.

Sincerely,
Duane H. Manier
906-563-9233
Vcie President & Cashier
First National Bank of Norway