

**From:** George Briant [mailto:George.Briant@fnbcan.com]  
**Sent:** Monday, March 23, 2009 12:33 PM  
**To:** Comments  
**Cc:** sscurlock@ibat.org  
**Subject:** Assessments - Interim Rule - RIN 3064-AD35

March 23, 2009

Mr. Robert E. Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, N.W.  
Washington, D.C. 20429

Re: 12 CFR Part 327; RIN 3064-AD35; Assessments

Dear Mr. Feldman:

Thanks for the opportunity to comment on the proposed 20 basis point emergency special assessment. First let me acknowledge that I understand that the FDIC fund has been funded by member banks since inception. I further understand that the fund must remain strong and stable and that it will ultimately be the responsibility of member banks to restore the fund balance.

We are paying a regular assessment this year for the first time in many years which we have managed to budget for. This special proposed assessment was a surprise to say the least. At 20bp, the assessment could be as much as 50% of last years' income for my institution. This is just more that we can safely contribute during a time when we need to be increasing capital levels. To meet this obligation could impede our ability to lend money in our community, contribute to community activities and make traditional donations just to name a few.

I would ask that consideration be given to reducing this proposed assessment and spreading our cost out over a longer period of time by utilizing various options such as borrowing from Treasury, issuing other debt or some other debt options.

Thanks for your consideration of my comments.

Respectfully,

George Briant  
President  
The First National Bank of Canadian  
Canadian, Texas 79014