REGIONS

July 29, 2009

Via electronic delivery

Mr. Robert Feldman
Executive Secretary
Attn: Comments
Federal Deposit Insurance Corporation
550 17th Street NW
Washington D.C. 20429

Re: RIN # 3064-AD37:
Notice of Proposed Rulemaking regarding Possible Amendment of the Temporary Liquidity Guarantee Program to Extend the Transaction Account Guarantee Program with Modified Fee Structure

Dear Mr. Feldman:

Regions Financial Corp.[1] appreciates this opportunity to comment on the Federal Deposit Insurance Corporation's ("FDIC") proposed amendments to the Temporary Liquidity Guaranty Program ("TLGP") to extend the Transaction Account Guarantee ("TAG") Program. The TAG program within TLGP is set to expire on December 31, 2009.

The TLGP continues to be an essential program to help provide liquidity to the financial markets during the current economic environment. The FDIC should continue to take steps that promote confidence in the financial system and to take actions that will support financial institutions and their depositors during the current uncertainty. As such, Regions supports an extension of the TAG program.

The TLGP helps insured depository institutions to alleviate concerns of customers that their balances are safe in light of the stories of bank closures, rating downgrades of banks

[1] Regions Financial Corporation is a member of the S&P 100. Regions is one of the nation's largest full-service providers of consumer and commercial banking, trust, securities brokerage, mortgage and insurance products and services. With $146 billion in assets, Regions serves customers in 16 states across the South, Midwest and Texas, and through its subsidiary, Regions Bank, operates 1,900 Regions banking offices and 2,336 ATMs. Its investment and securities brokerage, trust and asset management division, Morgan Keegan & Company Inc., provides services from 332 offices. Additional information about Regions and its full line of products and services can be found at www.regions.com.

and governmental budget shortfalls dominating the news. Most of these customers (such as government entities and nonprofits) have a fiduciary duty to assure that their funds are safe and secure. Additionally, an extension will buy time for banks to reload their repurchase collateral portfolio in preparation for the discontinuation of the 100% coverage, and inevitable migration of funds back to investments.

Given the program's role in stabilizing confidence and supporting financial institutions during tough economic times, an increase in the assessment from ten (10) basis points to twenty-five (25) basis points on non-interest bearing transaction accounts should not be part of the TAG extension. Additional assessments, such as what is proposed, will negatively impact the insured depository institutions at a greater cost and be counter to the underlying tenet of the TLGP, to restore liquidity. This cost may, in some ways, trickle down to the institution's customers.

Regions agrees with the new opt-out recommendations. Additionally, the opt-out be transparent and as such, Regions supports enhanced disclosure by all companies that continue with the TAG program or that decide to opt-out of the extension to their consumers. This disclosure should include the institution's status in the program as well as the amount that the non-interest bearing account is guaranteed.

Thank you again for the opportunity to share our views with you on this subject. If you have any questions, please feel free to contact me at (205) 264-5521.

Sincerely,

Chris Scribner
Vice President, Issues Management