

From: John Halbersleben [mailto:jhalb@cnbaccess.com]  
Sent: Tuesday, March 10, 2009 1:10 PM  
To: Comments  
Subject: Opposition to RIN 3064-AD35: Proposed FDIC Special Assessment pursuant to 12 CFR Part 327

John Halbersleben  
President  
The Commercial National Bank of Ainsworth  
P.O. Box 6  
Ainsworth, NE 69210-0006

March 10, 2009

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

Dear Robert Feldman:

As a banker for over thirty years, I have always felt that having banks self-insure through the FDIC was positive for the industry. I felt this in spite of the fact that having to pay FDIC assessments makes a bank less competitive with the Farm Credit System, a government sponsored enterprise, who is taking advantage of this low rate environment to cherry pick good credits.

The success or failure of our bank poses no "systemic risk" to the country's financial system. This was made abundantly clear during the 1980's and has been reinforced during the present economic crisis. Since a small privately owned bank like Commercial National Bank is only on the radar screen of our regulator, the OCC, most of the time, I feel banks like ours deserve some part of the financial pie we have helped create. My thought is that instead of the FDIC turning the money it collects over to the Treasury, they need to figure out a way to redistribute it back to the banks in the form of a callable at any time deposit. This would allow the banks a generally stable source of deposits which they could lend or invest as they see fit. Since these deposits are owned by the FDIC, I would propose the banks not have to pay insurance on them which would lower our cost of funds and help make us more competitive with the Farm Credit System. As far as how to allocate the funds back to the banks, one possible way would be to let the bank keep 1.15% of their deposits.

Please add my voice to those that feel the twenty basis point special assessment will create a financial hardship if done as outlined. I understand the need for it and support it but if it could be spread out between 2009 and 2010 it would be a lot more palatable. Your consideration of this matter is appreciated.

Sincerely,  
John Halbersleben  
402-387-2381  
President  
The Commercial National Bank of Ainsworth