

**From:** William Ellis [mailto:wellis@blissfieldstate.com]  
**Sent:** Monday, March 02, 2009 11:01 AM  
**To:** Comments  
**Subject:** Special Assessments

Federal Deposit Insurance Corporation:

I write to you with regard to this past Friday's approval of special FDIC assessments to all banks. I am the President and CEO of a small 136 year old rural farm bank in Michigan. Our bank remains strong by continuing to adhere to the basic tenants of conservative banking practices. We survived the Great Depression and will survive the current Great Economic Calamity, as well. We learned long ago to "save for a rainy day". Obviously, the proposed premium increases will hamper our profitability; however, our abundance of capital and high liquidity will see us through.

I'm certain the reader has heard it all by now and knows full well the offenders primarily responsible for our current dilemma. Blame has been, and continues to be, cast about. I will leave the final determination for others. My concern is that major high-impact decisions are being made without thorough and careful consideration being given to all possible ramifications. We know the so-called "big 8" were major contributors to our economic woes. And many offenders are rightfully being eliminated from the landscape. It is possible that we have ignored our anti-monopoly laws far too long and should re-visit them sometime in the very near future.

What bothers me now is that the solutions being proffered can injure innocent parties. I don't believe the problem will be resolved by weakening viable community banks with onerous fees. This is a unique situation that requires careful consideration and objective deliberation. I know community banks, especially in Michigan, are doing their utmost to assist borrowers whose basic welfare is being threatened every day. A lot of creative thinking is being used to aid these distressed individuals.

Hopefully, the FDIC is employing some creative thinking when it comes to restoring the quickly depleting insurance pool. I realize it is the responsibility of all banks to restore these funds. I also appreciate that the proposed time to do so is being extended from five to seven years. My concern is that, given the magnitude of need, seven years might not be long enough. Perhaps alternative longer-term funding could be obtained that would accommodate longer repayment, thus putting less of a strain on community banks that are experiencing greater challenges than mine, but remain viable none-the-less.

I thank you for your time and consideration.

Sincerely,  
William Ellis