

From: Donna Banker [mailto:twilight.1212@hotmail.com]
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To: Comments
Subject: Assessments - Interim Rule - RIN 3064-AD35

As an officer of a small community bank located in WV, I would like to address the concerns that I have about the recent announcement on FDIC special assessments.

Community banks have always operated in a conservative and prudent manner so as to protect the investment of our shareholders and to serve our community safely. Now we are being asked to sacrifice our net income, our lending capability, our capital to increase the DIF fund through no fault of our own. We have had to bail out the S&Ls, and now we are having to yet again decrease our profits and dividends to our shareholders for apparent poor regulatory supervision and risk taking by bank executives - who seemingly cared not about the economy nor the banking system by downplaying the risks they were taking and giving themselves exorbitant bonuses and salaries. Especially in the "systemically significant" too big to fail banks. If they are too big to fail, put them in a separate DIF fund and let them bail each other out.

It appears to me that the special FDIC premium assessment will only serve to transfer the consequences of the irresponsibility of the "systemically significant" banks to community banks. We do not have the ability to continue to pay these special assessment and huge premium increases and continue to build up our capital and ALLR as we are told by the regulatory agencies that we should do. This could cause additional bank closures, and lowering public confidence in our nation's community banks.

For the TBTF banks who have not paid premiums on their off-balance sheet liabilities for years, something that the ICBA and the ABA have brought to your attention time and time again. And for us - the community bankers - to have to bail out these banks defies logic.

Others have made these suggestions and I shall make them as well: reduce the special assessment and spread the cost of it over a long period of time. The recapitalization of the DIF should be spread out over a longer timeframe as well. Increase the FDIC's borrowing authority with Treasury and the bank's can pay this back over a longer period of time so smaller community banks can still be a viable entity in our communities.

Thank you for taking my comments.

Anonymous Banker