From: Michael Tucker [mailto:mtucker@greenfieldcoopbank.com]
Sent: Tuesday, March 10, 2009 9:47 AM
To: Comments
Subject: Opposition to RIN 3064-AD35: Proposed FDIC Special Assessment pursuant to 12 CFR Part 327

Michael Tucker
President & CEO
Greenfield Co-operative Bank
63 Federal Street
Greenfield, MA 01301-2543

March 10, 2009

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

Dear Robert Feldman:

I am submitting this comment letter on behalf of the depositors and employees of Greenfield Co-operative Bank (the "Co-op"). The Co-op is a mutually chartered community bank, with $257 milion in assets and 4 offices in Franklin County, Massachusetts. We have no stockholders, and are operated for the benefit of our depositor members and the communities we serve.

When I first read about the proposed special assessment, I understood the need to ensure the FDIC remains a strong and viable backstop for the integrity of our banking system. My concern is over the immediate and negative impact such a large assessment would have on community banks such as ours, which had absolutely nothing to do with the current crisis. Banks like mine that never made a subprime loan and have served our communities in a responsible way for years and years are being unfairly penalized.

The special assessment is a significant and unexpected cost to my bank that will devastate earnings and our ability to respond to our own customers who might be impacted by the economic downturn and increasing unemployment. Again, we understand the need to rebuild the insurance fund from the insureds, including GCB, but would respectfully ask that the proposal be modified to spread such a significant cost over a period of time. Such a proposal would have to be carefully structured to avoid having the accountants claim we need to "reserve" now for future assessments.

Making a modification such as this would ensure that the fund remains secure and will allow my bank to continue to actively lend in our community. I urge you to take these suggestions into consideration when the Board meets in April to finalize the special assessment rule.

I would also ask that the FDIC and Congress take another look at the concept of "too big to fail" which supposedly was gone with the changes from FDICIA back in 1991. Additional reasonable limitations on what size institution would be too much of a concentration and thus "too big to fail" should also be considered.

Clearly, just as any prudent bank limits its own credit risk by not putting too much capital at risk with any one loan or investment, such size limitations would be a useful way to limit systemic risk.

Finally, I would urge your continued support of the dual banking system and a return to reasonable restrictions on the mixing of banking and commerce, such as the old Glass-Steagall Act had in place. Keeping strong community banks and strong regional banks better serves this country by insulating our financial system from the type of impact that these "mega-bank" failures (or "quasi-failures") is having on everyone.

Very truly yours,

Michael E. Tucker
413-772-0293
President & CEO
Greenfield Co-operative Bank