

From: Bill Short [mailto:bill.short@touchmarknb.com]
Sent: Tuesday, March 10, 2009 9:48 AM
To: Comments
Subject: Opposition to RIN 3064-AD35: Proposed FDIC Special Assessment pursuant to 12 CFR Part 327

Bill Short
President & CEO
Touchmark National Bank
3740 Davinci Court, Suite 150
Norcross, GA 30092-7614

March 10, 2009

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

Dear Robert Feldman:

The recent announcement of a special assessment to replenish the Deposit Insurance Fund is certainly no surprise - the details of the announcement, however, are quite disturbing. We are a 13 month old de novo bank with \$44 million in deposits. This assessment will cost us \$88,000 above and beyond the now increased standard insurance costs.

Our bank has done everything possible to promote soundness, profitability and growth. We raised almost \$35 million at the holding company level in a very tough capital market. We have pursued loan opportunities prudently and have been ever mindful of expenses. Now, we are being sent a bill for \$88,000 to cover the sins of the banks "too big to fail". It is not my responsibility to bail these banks out of their mess. Main Street did not create this problem and should not be the primary solution. \$88,000 represents a good, strong lender at a Community Bank like ours. It is tough enough getting to profitability in this economic environment. It is even tougher when resources are arbitrarily taken away due to the misguidance and malfeasance of others.

I would ask that you strongly reconsider your position on this matter. De novo banks should be totally excluded from this special assessment and all community banks should be assessed at a considerably discounted rate, if at all. There are other solutions that more equitably balance the assessment with the offending parties. Please protect the community banks from these unwarranted expenses - we are at the core of the American banking system, ultimately the greatest banking system in the world. Thank you for your consideration.

Sincerely,

Bill Short
770 407-6710
President & CEO
Touchmark National Bank