
From: Bradfute, Richard [mailto:rbradfute@PortalesNB.com]
Sent: Friday, March 27, 2009 6:38 PM
To: Comments
Subject: Assessments, RIN 3064-AD35

March 27, 2009

Dear Sirs:

You can appreciate the significant impact of the FDIC decision to summarily impose a 10 or 20 basis point special assessment, as well as potential 10 basis point assessments per quarter, on its banks.

Implementation of this special assessment will cripple our bank's profitability, claiming as much as 70% of our annual profit. We do not issue stock, and profits are critical to maintaining our strong capital position. Such an impact to our bottom line will significantly impair our ability to operate, and could put the bank in danger of failure.

Community banks like ours are the backbones of the areas we serve. We did not contribute to the Big Bank and Wall Street meltdowns. In fact, we have lessened the impact of the recession in our communities by continuing to provide credit to qualified applicants. The imposition of this special assessment will significantly impair our ability to continue to do so.

Unlike our Big Bank competitions, we are not too big to fail. We are also not big enough to bail out the failures of the Big Banks. We didn't cause this problem, and we are not the solution for those who did. Please explore numerous alternatives to fund the FDIC, including basing the special assessment on total assets (minus capital) instead of on total deposits, using existing authority to borrow from the Treasury or banking institutions such as ours, and/or using debt instruments to the public.

Please do not cause healthy banks to fail in a doomed effort to assuage accountability for the greed and irresponsible management of the smartest people in the room.

Please do not place such a grievous burden upon our backs.

Sincerely,

Richard E. Bradfute
Senior Vice President/Chief Information Officer

RICHARD E. BRADFUTE

Senior Vice President/Chief Information Officer
James Polk Stone National Bank