From: Ruth Updike [mailto:rupdike@msbonline.com]

Sent: Friday, March 27, 2009 6:11 PM

To: Comments

Subject: FDIC Special Assessment

- · Community banks, which did not cause the economic crisis, should not pay any special assessment.
- The FDIC should ask Congress for the authority to levy special assessments on the TBTF banks that caused the financial meltdown.
- The FDIC should tap its line-of-credit with the Treasury.
- · If all banks are assessed, then the FDIC should assess premiums based on total assets (minus tangible capital) rather than domestic deposits, which would rightfully place greater responsibility on the TBTF banks.
- · Community banks, which did not cause the economic crisis, should not pay any FDIC special assessment.
- · Authorize the FDIC to levy a special assessment only on the too-big-to-fail banks that are largely responsible for the financial and economic meltdown as a result of their excessive risk-taking and greed.
- · Support an increase in the FDIC's line of credit from the current \$30 billion to \$100 billion.
- · If all banks are assessed, then urge the FDIC to assess premiums on the basis of total assets (minus tangible capital) rather than domestic deposits; the TBTF banks would then be responsible for a larger portion of the assessment.
- · Urge the Financial Accounting Standards Board (FASB) to give banks the option to spread any special assessments over four years.

Thank you,

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