

MINNOCK CONSTRUCTION COMPANY

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March 27, 2009

Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, DC 20429

Re: RIN 3064-AD35

Dear Mr. Feldman:

As an outside board member of a community bank in Western Pennsylvania, it seems to me that the approach being taken by the FDIC is to penalize the community banks at the exact wrong time of the economic cycle.

A special emergency assessment would weaken our country's strongest link to economic recovery right now - community banks. We and other community banks are doing all we can to provide lending to small businesses and consumers in an effort to restore stability to the housing market and the financial sector. The proposed FDIC's special emergency assessment will impose a large, and unnecessary drain on capital, and will have the effect of redirecting working capital from the community-at-large to the insurance fund.

The proposed Deposit Insurance Fund (DIF) increase in premiums along with a 20 basis point emergency special assessment to replenish reserves to 1.15% over 7 years will place, most assuredly, an undue burden on sound community banks throughout the country. Would it not be better to replenish the reserves in smaller increments over a 10 or 15-year period, rather than in larger increments. This proposal would severely impact earnings at a time when community banks can ill afford it.

Hopefully the FDIC can understand the position of community bankers on this very important issue, and make appropriate changes to the proposed assessment!

Sincerely Yours,

MINNOCK CONSTRUCTION COMPANY

Patrick J. Minnock

Patrick J. Minnock, President

Copy: Cam Fine, ICBA
Frank Pinto, PACB