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To: Comments
Subject: RIN 3064-AD56

Comment of Ryan Bowles, Washington, D.C.

I am in favor of the proposed regulation cited above.

It strikes me as a reasonable policy that the FDIC would consider the size and nature of bonus payments in its assessment of risk of a given bank. Banks who pay outsize bonuses are encouraging risky behavior by employees that would seem to increase the overall risk of bank failure.

I would suggest that the FDIC needs to consider company-wide bonus practices, not just those at the mid or senior levels, as all employees (particularly at smaller banks) contribute to the amount of risk the bank takes on.

I would also suggest that the type of bonus compensation is not in itself as relevant as the amount of the compensation. That being said, non-cash compensation could be more easily "clawed back" and might be risk-reducing.

I urge the FDIC to act on compensation, and not wait for action by the Federal Reserve or Congress. This is a reasonable regulation and could always be amended or changed should alternate direction from from either the Congress or the Federal Reserve.

Sincerely, Ryan Bowles