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February 3, 2016

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

Re: FDIC Assessment Premium for Small Banks:

Mr. Feldman:

Pursuant to the proposed changes in the assessment for small banks, I suggest to you that;

- 1) Community banks are the backbone of our economy. Small businesses are more apt to obtain better financial advice and a more receptive and friendlier banker for their financing needs which in turn leads to increased job creation which benefits the entire community.
- 2) The entrepreneurial spirit of community bank organizers contributes to the local community which will in turn provide a reasonable return to the investors.
- 3) Community banks, which themselves are small business should not be penalized through higher premiums for their success and growth but instead should be assessed based on their overall performance and examination rating. It is similar to punishing "A+" student for working hard, using their time wisely and achieving good grades when a majority of students will not achieve "A+" grades. The "grades" should correspond to their level of performance as determined by their teachers/professors/examiners and not by exceeding growth expectations.
- 4) A bank rated a "2" or higher with a demonstrated solid growth strategy set by the board and executed by management should be rewarded by a lower assessment rather

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than higher one. These growth opportunities actually provide more jobs within the bank's delineated community while at the same time expanding the local business base.

I respectfully request the Board of the FDIC to consider my points and not penalize the success of the community banks with unwarranted higher assessments but instead reward them by lowering the assessment. In my opinion, the key factor for establishing the assessment should be the CAMEL rating, not the growth. Risky growth is eventually reflected in the bank's CAMEL rating.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. J. Shah', with a long, sweeping horizontal stroke extending to the right.

J. J. Shah
Chairman,
Board of Directors,
Touchmark Bancshares, Inc. and
Touchmark National Bank