



# HAWAII BANKERS ASSOCIATION

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March 9, 2006

Robert E. Feldman, Executive Secretary  
ATT: Comments/Legal ESS  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW.  
Washington, DC 20429

RE: Proposal to Modernize Large-Bank Deposit Insurance Determinations.

Dear Mr. Feldman:

We appreciate the opportunity to comment on the Advance Notice of Proposed Rulemaking on the best way to improve the process of determining the insurance status of depositors of larger institutions in the event of a failure.

Unfortunately, the Hawaii Bankers Association do not support any of the three options presented. We feel the proposal is not needed and would be too costly for financial institutions to implement.

While the FDIC should be prepared to meet the challenge of the disposition of failing banks, rarely has it been necessary for the FDIC to have to close a bank with little warning. It seems unnecessary for the entire banking industry to support the heavy cost of maintaining account linkage data on an ongoing basis. Further, it seems that this process would provide no benefit to the FDIC or to the banking industry that would lend itself to lower deposit insurance premiums.

We respectfully request that the FDIC not propose a notice of rulemaking that would implement this process and requirement.

Cordially,

Rodney R. Shinkawa  
Executive Vice President