



# Bank of Illinois

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September 7, 2006

Mr. Robert E. Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 Seventeenth Street, N.W.  
Washington, D.C. 20429

Attention: Comments

Re: Deposit Insurance Assessments and Federal Home Loan Bank Advances  
RIN 3064-ADO9

Dear Mr. Feldman:

The Bank of Illinois in Normal is pleased to provide comments in response to the Federal Deposit Insurance Corporation notice of proposed rulemaking and request for comment on deposit insurance assessments. Specifically, I am writing to address the FDIC's request for comment on whether Federal Home Loan Bank (FHLB) advances should be included in the definition of volatile liabilities or, alternatively, whether higher assessment rates should be charged to institutions that have significant amounts of secured liabilities.

I believe that FHLB advances should not be characterized as "volatile liabilities" for FHLB members. FHLB advances are secured extensions of credit to members with pre-defined, understood, and predictable terms. Unlike deposits, advances liabilities do not increase or decrease due to circumstances outside of the control of an FHLB member. Experience has shown that deposits may be lost due to disintermediation arising from a variety of factors: special, short-term promotions in a particular market or the existence of higher returns to depositors on alternative investments. Our experience has also shown that our customers will not purchase longer-term certificate of deposits in the three and five year time frames. This causes a mismatch with our loan customer's demands and our offering of three and five year fixed rate loans. The Federal Home Loan advances is one of the few ways we can extend of our liabilities to match the terms of our loan request. On one hand you require us to match our assets and liabilities and if this proposal is approved you will penalize us for using one of the few ways we can match the maturities of our assets and liabilities.

As established by Congress, the primary purpose of the FHLB System is to provide a source of liquidity for FHLB members. Throughout their 74-year history, the FHLB's have performed this mission successfully. The FHLB's are a stable, reliable source of funds for member institutions, and the availability of such credit has a predictable, beneficial effect on members' business plans. Given the value of such a stable source of finding, it is not surprising that more than 8,100 financial institutions are members of the FHLB System. It would be illogical to include FHLB advances in the definition of volatile liabilities given the stability of the FHLB's, the reliable availability of advances as a source of wholesale funding, and the beneficial and predictable effect of such finding on members' business plans.

Deposit insurance premiums should be based on an institution's actual risk profile (which includes interest rate risk and GAP analysis), taking into account an institution's supervisory rating and capital ratios. Banks that are engaged in excessively risky activities should pay a higher premium, regardless of whether those activities are financed by insured deposits, FHLB advances, or alternative wholesale funding sources.

The continued availability of FHLB advances reduces the risk of failure of FDIC-insured institutions. Charging a higher deposit insurance premium to financial institutions that use advances could discourage borrowing from the FHLB's and lead to the unintended effect of increasing risks to FHLB members. Financial institutions frequently use FHLB advances for liquidity purposes and to manage interest-rate risk, as well as to fund loan growth. In many markets, the supply of deposit funds is inadequate to meet loan demand and prudent financial management needs. Curtailing the use of FHLB advances would force institutions to look to alternative, often more costly wholesale funding sources that are actually volatile, thereby reducing profitability and increasing liquidity risk.

In addition, the proposal would hurt consumers by increasing the cost of funding mortgage portfolios. Making FHLB advances more costly would likely result in a reduction of borrowing and thus income to the FHLB's. This, in turn, would reduce the funding available to the FHLB's Affordable Housing Program and other community investment programs. In 2005, the FHLB's provided \$280 million in direct grants for affordable housing across the nation.

Penalizing the use of advances through the imposition of insurance premiums also would conflict with the intent of Congress in establishing the FHLB's, in opening membership in FHLB's to commercial banks in FIRREA, and, more recently, in adopting the Gramm-Leach-Bliley Act, which expanded small banks' access to advances. The FHLB's mission is to provide financial institutions with access to low-cost funding so they may adequately meet communities' credit needs to support homeownership and community development. Charging higher assessments to those banks utilizing advances would, in effect, use the regulatory process to vitiate the FHLB's mission as established and repeatedly reaffirmed by the Congress.

During the consideration of FDIC reform legislation in the past several years, Congressional Committees and principal sponsors of such legislation expressed specific concerns that the FDIC, in developing a risk-based insurance assessment proposal, not adversely affect advances. The Congressional intent has been expressed in both the House and Senate on a bi-partisan basis. Both the House Budget Committee report on reconciliation (November 7, 2005) and the House Financial Services Committee report on deposit insurance reform (April 29, 2005) contained such expressions of concern.

Finally, a regulatory and legal structure is already in place to ensure collaboration between the FDIC and the FHLB's. If an FDIC-insured institution is experiencing financial difficulties, the FDIC and the relevant FHLB are required by regulation to engage in a dialogue to ensure the institution has adequate liquidity while minimizing other risks, including losses to the FDIC.

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The cooperative relationship between the FHLB's and member financial institutions has worked well for 74 years. FHLB advances serve as a critical source of credit for housing and community development purposes, support sound financial management practices, and allow member banks throughout the nation to remain competitive. FHLB membership has long been viewed as protection for deposit insurance funds because FHLB members have reliable access to liquidity. Penalizing financial institutions for their cooperative relationship with the FHLB's would unjustifiably limit their ability to offer competitive pricing, limit credit availability in the communities they serve, and limit the members' use of a valuable liquidity source.

I urge the FDIC not to include Federal Home Loan Bank advances in the definition of volatile liabilities or to impose a deposit insurance premium assessment on "secured liabilities". If you include FHLB advances in the definition of volatile liabilities you will penalize each bank by increasing their costs for using Federal Home Loan advances to reduce their interest rate risk and those bank's that no longer use FHLB advances will potentially increase their interest rate exposure and costs.

Sincerely,



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