

**From:** Jim Powell [mailto:Jim.Powell@highlandcommercialbank.com]  
**Sent:** Friday, September 15, 2006 4:55 PM  
**To:** Comments  
**Subject:** RIN 3064-AD09 Assessments

Thank you for the opportunity to comment on this proposed change in deposit insurance assessments. Please accept my opinion based on my review of this proposed change recognizing it represents only my opinion and not those of others. Having been in banking since 1968, lived through the real estate debacle of the mid 70s, other crisis in the 80s and 90s, dealt with the unfair (from a bank perspective) of the rescue of the Savings and Loan industry and the SAIF; it is difficult to find the logic in the proposal as it relates to 'new' banks. There is little or no evidence in Georgia to support a position that small banks present more risk to the fund than do large banks other than the too big to fail mantra. Having worked in a large banking organization and having taken over as President of two troubled banking institutions and restored them to health; I have seen that clearly the current system of CAMELS ratings and capitalization levels represents a satisfactory program. After all, even when saddled with the S&L problem, the banks made it work and restored BIF. As an alternative, I would suggest looking at how large banks house funds to see if assessments are correct and perhaps place a premium on the too big to fail protection offered under current reality. Deposit insurance is still a valued commodity to our senior customers though the younger generations (under 40) seem to not be nearly so interested. Perhaps they will as they get older but there is increasing evidence that investment comfort levels are outside of bank deposits with this group. As we constantly compete with nonbanks and uninsured investment alternatives, the funding of small banks, many of them new, is challenging enough without being saddled with another cost. I urge you to re-evaluate this proposal. 9/15/06

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Chartered 8/31/04