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**To:** Comments

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Comment on changes to FDIC risk-based assessment system to be effective April 1, 2009.

Accepting brokered deposits without prior permission is already allowed for well-capitalized institutions. A new assessment ratio for well capitalized banks who accept brokered deposits is directing additional premium to banks who are not troubled. This seems to be outside the intent of the rate increase which is to increase premiums to banks which have a greater risk of failing. Well-capitalized banks will already have to pay almost double the current premium based on the proposal to increase rates effective 1/1/09. My recommendation would to only apply this new financial ratio to banks who are not well-capitalized.

In any event, reciprocal deposits should be excluded from the brokered deposit calculation because these have characteristics more typical of core deposits.