

November 10, 2008

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

RE: RIN 3064-AD35, Proposed FDIC Premium Increase

Dear Mr. Feldman,

I am writing in response to the Federal Deposit Insurance Corporation's (the "FDIC") request for comments on a proposal to increase deposit insurance premiums.

Our bank currently uses brokered deposits and currently stand at about 10% of overall deposits. We find these deposits useful and important source of liquidity. Often times, brokered deposits are a cost effective funding source and less expensive than local time CDs of the same maturity.

Brokered deposits are also an efficient method of getting deposits from where they are located to where they are needed. The group of individuals that favor these types of investments live in a few states, mainly Florida, Texas, Arizona, Nevada, and California.

I believe your 10% brokered deposit threshold is too low and should be set at at least 20% of overall deposits.

Thank you for letting us comment on the brokered deposit issue.

Sincerel

David W. Woodcock

President

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