

November 7, 2008



Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street Northwest
Washington, DC 20429

SUBJECT: RIN 3064-AD35 – Notice of Proposed Rulemaking on Risk-Based Assessments

Dear Mr. Feldman:

Thank you for the opportunity to comment on the proposed amendment to 12 CFR 327, specifically relating to the manner of premium calculation for deposits placed through brokered sources.

Fidelity Bank is a locally owned institution with our roots in the communities that we serve. We currently have assets of \$1.7 billion, and 25 branch locations serving both Kansas and Oklahoma. Fidelity Bank has historically not been a large user of brokered deposit sources. Our current outstanding brokered CD balances are less than \$60 million and substantially all mature within the next eight months.

We have found that brokered deposits are a useful and important source of liquidity, particularly when the environment is as uncertain as is currently the case. For us, deposits obtained through registered broker-dealers have been a cost effective source that is often times more competitively priced than we are able to raise deposits in our local environments.

We do not believe that the thresholds suggested by the proposal have any particular relationship to potential increase of loss to the insurance fund based upon our periodic participation. We would agree that abuses by some institutions could occur and a mechanism should be in place to identify those institutions and deal individually with them accordingly.

We are concerned that if thresholds are imposed, examiners and auditors will tend to view the threshold as a cap and while we do not approach the usage level of the proposed threshold, we would like to preserve the funding opportunity as long as it is properly priced.

For these reasons we request that the FDIC not impose the premium structure as proposed but rather deal with individual banks that your examination staff defines as abusive.

Thank you for the opportunity to comment on the proposed amendment.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Wilgers", written over a white background.

Bruce Wilgers
EVP/Chief Financial Officer