



November 14, 2008

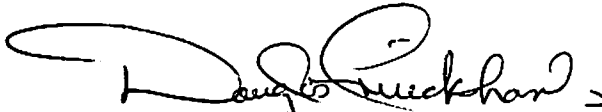
Mr. Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street Northwest
Washington, D.C. 20429

Dear Mr. Feldman:

The Federal Deposit Insurance Corporation has requested comments on the proposal to increase deposit insurance premiums and I am most concerned about the adjustments regarding brokered deposits. During the current crisis, there seems to be broad agreement that re-establishing the flow of credit is a priority. To fund loan growth, many banks turn to the brokered CD market for liquidity. By establishing a 10% threshold, our ability to extend credit will be limited. I recognize that the threshold applies only to increased deposit premiums but an unintended consequence may be to apply a stigma to banks that exceed that number.

I would urge the FDIC to look for ways of monitoring the brokered CD market in such a way that it continues to be a source of liquidity for banks. If a threshold is necessary, I would hope that it would be phased in over a period of time. The immediate impact of establishing a threshold would be to constrict lending. Thank you for your consideration and thank you for your leadership during this difficult time.

Sincerely,



Douglas Cruickshanks, Jr.
President

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