

October 20, 2008

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

Re: Federal Deposit Insurance Corporation Notice of Proposed Rulemaking,
RIN 3064-AD35

Dear Mr. Feldman:

I am the CEO of Apple Advertising in Asheville, NC. I have community bank clients and have provided marketing services for banks and thrifts since 1972. I have seen the positive impact that the CDARS Reciprocal Deposit program has on banking consumers. I have also seen the value of the program for community banks.

I'm adding my voice to those who ask that CDARS Reciprocal Deposits be excluded from the Notice's definition of brokered deposits – in fact, I'm asking that you not consider CDARS Reciprocal deposits as brokered deposits for any purpose.

I'm sure you'll be receiving many letters, all technical in nature, concerning why the program should not be lumped with "brokered deposits. However, I urge you to look beyond the technicalities and focus on the benefits to banking customers:

- * Solid, reliable returns, and
- * The convenience of working with just one bank

I'd also ask that you consider that the CDARS deposits act just like Core Deposits for participating banks. Surely, there's never been a better time to assist banks by not impeding their acquisition of such a vital segment of deposits.

Thank you for your consideration of these points.

Yours truly,



George Self, CEO
Apple Advertising, Inc

cc: Sen. Richard Burr	217 Russell Senate Office Building Washington, DC 20510
Sen. Elizabeth Dole	555 Dirksen Senate Office Building Washington, DC 20510
Rep. Patrick McHenry	224 Cannon House Office Building Washington, DC 20515

