From: Jorge Triay Sent: Tuesday, October 28, 2008 1:35 PM To: Comments Subject: RIN 3064-AD35

As a member of the FHLBank in Atlanta I request that the FDIC withdraw its current proposal in order to limit unnecessary stress on insured depository institutions during this extraordinary period. This proposal could hamper the ability of financial institutions to provide credit to their communities. In particular, by proposing higher premiums associated with the use of secured liabilities, the FDIC potentially is increasing the cost of funds.

Instead of adopting this proposal, the FDIC could better achieve its policy goals by taking the following steps:

- Extend the time period to rebuild the deposit insurance fund from five to 10 years
- Establish a new premium schedule at the end of 2009. This is a more prudent timeframe given the current environment and the temporary emergency actions taken by the government that will expire at the end of 2009.

Sincerely

Jorge I Triay President & CEO First Bank of Miami