From: Joe Monahan [mailto:monahan@consolidated.net]
Sent: Wednesday, September 30, 2009 5:11 PM
To: Supervision
Subject: Prepaid Assessments

Robert E. Feldman
Executive Secretary
FDIC
550 17th Street NW
Washington, D.C. 20429

Dear Mr. Feldman,

Why not borrow from members at an adjustable rate favorable to members? Healthy members could be rewarded for good conduct. You need an average of $6,000,000 per member and all costs would be born by members. What is the objection to borrowing from healthy members rather than presenting another proposal geared mainly to the big problem banks?

If you can not borrow from members, please give us a tax deductible alternative to a three year prepayment. Why not offer a one time special assessment (tax deductible when paid) with a suspension of assessments for the next three years in addition to the present proposal.

Please consider adjusting your assessments to a bank's loan leverage. We are tired of rewarding bad conduct. Why not charge a 1% premium for every 1% increase in loan ratio over 50% and give a discount for every 1% decrease below 50%?

We favor a moratorium on charters and branches, since 90,000 offices serve 50 states. Lastly, reinstitution of Reg Q deposit rate ceilings are needed. Our failing competitors are driving up our cost of funds and are not here to pay the special assessments. Geographic restrictions of 15 miles or 25 miles for sparse populations for all realestate, auto, and credit card loans will work.

This crisis was caused by too much leverage by too impersonal a lender adhering to too few rules.

The First National Bank of Arcola

Joseph M. Monahan
Chairman of the Board