

From: Gayton, Richard [mailto:Richard.Gayton@opco.com]
Sent: Thursday, July 23, 2009 5:37 PM
To: Regs
Subject: FDIC

To Whom It May Concern:

The Federal Deposit Insurance Corporation's mission to maintain the stability of the nation's banking system. Why would the FDIC require private equity investors to maintain a 15% Tier 1 ratio versus an 8% for non-PE investors and hold their bank investments for at least three years before selling?

Private investor's are cash rich and want to buy banks. Many PE firms have managers that are as good if not better than the managers of the banks they want to buy. I think PE can help maintain the stability of the nations banking system. Maybe I'm missing something. What is the logic in requiring PE to maintain a higher Tier 1 ratio?

Richard Gayton
310-740-1560