
From: Roger Severson [mailto:rogers@securitystatebankiowa.com]

Sent: Friday, October 02, 2009 10:24 AM

To: Comments

Subject: Recapitalizing the DIF by prepaying 13 quarters of assessments

Actually, I have no problem with the prepaying of assessments but, I am concerned with the methodology of the calculation. I would much rather see all future assessments calculated using the methodology of Assets minus Tier 1 Capital. This is a more equitable method. As you well know, bad assets cause bank failures not bad deposits. The method used to calculate the "Special Assessment" of June 30, 2009 more accurately assesses all banks based upon their risk to the stability of the banking industry. The banks that pose the greatest threat to the stability of the system should shoulder the largest premiums. Those banks who do not pose a large risk to the system should not have to carry those that do.

Thank you for considering my comments.

Respectfully,

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