
From: Paula DeBerry [mailto:Paula.DeBerry@commerceunionbank.com]
Sent: Monday, March 09, 2009 3:07 PM
To: Comments
Cc: info@icba.org
Subject: FDIC Special Assessment

As a member of the executive team of Commerce Union Bank I am very disheartened by the proposed 10% - 20% special assessment on all banks based on deposit base as of June 30, 2009.

As a denovo bank we just broke into profitability last November with a constant watchful eye on our balance sheet. Needless to say, during these economic times operating in the black is a constant challenge and this one time, unbudgeted assessment would be detrimental to our bottom line for 2009.

We are a healthy bank with \$125,000,000 in assets and \$28,000,000 in capital that did not participate in the TARP money. Our loan portfolio is very clean because we did not participate in the risky loan practices that have resulted in so many bank failures. We feel now we are being penalized when in reality the problems banks should have to carry the "lion's share" of this assessment, or at minimum the assessment be risk based on the bank's ratings. Also, as a community bank we are actively seeking new loan opportunities and are not shying away for good loan opportunities...is that not our goal to grow out of this recession?

We feel the FDIC should look for other alternatives which will treat the healthy banks more fairly. All banks shared the burden of increased FDIC expenses with the amount of coverage being increased, but all banks should not share the assessment burden equally. We cannot continue to penalize banks which make sound, strategic banking decisions. We would appreciate your consideration.

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