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**From:** Garth Gibson [mailto:ggibson@montrosebank.com]

**Sent:** Monday, March 09, 2009 12:33 PM

**To:** Comments

**Cc:** adam.jones@markudall.senate.gov; Layath\_Elhassani@bennet.senate.gov

**Subject:** Assessments, RIN 3064-AD35

I am requesting that you(FDIC) reconsider the special assessment of \$.20 per hundred of deposits. I am an owner of a small rural independent and family owned bank with assets of approximatley \$190 million. We are presently a well-managed and highly rated CAMEL bank. Our asset quality, current year earnings and capital as of this time and prior to to any specail assessment are strong. Community banks like ours have contributed very little to the current financial mess. Yet, you are asking that we pay the same as the larger institutions that are responsible for the current meltdown. In 2007 our FDIC premium amounted to \$28,000. In 2008 it increased to \$128,000. Based on our high CAMEL rating and prior to any "special assessment" we calculated our 2009 premium at \$245,000. The special assessment as calculated at \$.20/\$100 deposits would cost our little bank \$330,000 for the year in additon to the \$245,000 we are already going to pay. That amounts to \$575,000 for the year 2009, about a month and one-half of earnings before tax. I don't support the special assessment. Consider borrowing from the Treasury or asking the government for funding. Why do you want to penalize the banks that are keeping main street functioning. If you can't rationalize my request to eliminate the special assessment, then I urge you to consider broadening the assessment base which would directly increase the assessment to those banks who contributed to this mess in a more equitable manner. Use Total Assets less tangible equity instead of total deposits as the assessment basis. Regulatory agencies have pounded us as long as I can remember to increase "core deposits" and now we could pay a price for doing this as the assessment applies to these depostis and not to other types of borrowed money. Also, if a special assessment is required, let us ammortize it over some period of years so we don't end up having a year of profitability shattered by a FDIC speical assessment. It is a self-fufilling prophecy that a bank's captial and earining components of their CAMEL rating will be lowered if this special assessment of \$.20/\$100 stands. I urge you to be careful and use commone sense in analyzing this proposal.

Garth L. Gibson  
President, CEO and Owner  
MontroseBank  
Montrose, Colorado