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**From:** Harry Comm [mailto:Hcomm@hcsbank.com]  
**Sent:** Monday, March 09, 2009 12:02 PM  
**To:** Comments  
**Subject:** Assessments - Interim Rule - RIN 3064-AD35

I am writing to comment on the "one-time" Special Assessment of 20 basis points as proposed by the FDIC. One of my concerns is that this is an across the board assessment, without consideration of risk or effect. The fact that this is in addition to the considerable increase in the regular quarterly assessment is another reason for expressing my serious reservations as to this method of recapitalization of the insurance fund.

It is disconcerting to us that we have to be part of the solution to a problem in which we did not participate. Like many West Virginia banks, we have been a conservative lender. Hancock County Savings Bank is a mutual savings bank that has served its communities since 1899. We have always maintained strong underwriting guidelines, are mainly a 1-4 family mortgage lender, and have never sold a loan on the secondary market. This has always been our business model, and we plan to continue doing business in this manner.

We rely primarily on our depositors to fund our lending activities. Therefore, we are acutely aware of how important a strong FDIC insurance fund is to our success. Paying our share to keep this fund strong is a responsibility we take seriously. Our regular assessment for 2009 has increased by approximately six(6) times what we paid in 2008. The 20 basis point Special Assessment will be on top of that huge increase.

Our bank is in a strong capital position because we have been able to maintain consistent income year after year. While we plan to continue our consistent earnings, the increases you have proposed will make our budgeting process much more difficult.

I urge you to consider a number of the alternative plans being discussed with you by many in the banking industry. Our bank wants a strong insurance fund and will do our part to contribute to that end. However, please consider the alternatives to a significant decrease to the bottom lines of the strong banks.

Sincerely,

Harry Comm, President/CEO