
From: David Dewey [mailto:ddewey@dairylandstatebank.com]

Sent: Monday, March 30, 2009 12:49 PM

To: Comments

Subject: Assessments, RIN 3064-AD35

Dear Staff,

I believe the FDIC should re-examine the issue of imposing a special assessment on community banks to replenish the FDIC insurance fund.

Community banks, which did not cause the economic crisis, should not pay any special assessment. An onerous special assessment would negatively impact earnings and capital, substantially limit community bank ability to lend and exacerbate the current economic downturn.

The FDIC should ask Congress for the authority to levy special assessments on banks considered too big to fail (TBTF) that have caused our current economic problems.

The FDIC should use their line at the Treasury to replenish the insurance fund or move TARP money into the fund.

If all banks are assessed, we urge the FDIC to assess premiums based on a bank's assets (less tangible capital) rather than domestic deposits, which would rightfully place greater responsibility on the TBTF banks.

We would also ask that the Financial Accounting Standards Board (FSAB) give the banks the option to spread any special assessment over four (4) years.

Sincerely,

Dave Dewey
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