From: Bill Rayfield [mailto:billrayfield@yahoo.com]
Sent: Friday, March 06, 2009 10:16 AM
To: Comments
Cc: Gregg Lewis
Subject: FDIC assessment

March 6, 2009

Attn: Sheila Bair
Chairman FDIC

Dear Ms. Bair:
Please consider other ways of raising money for the FDIC fund before allowing the special 10 cent assessment. By assessing additional monies, you will be jeopardizing some healthy community banks that have not had anything to do with this crisis.
Please consider these possible alternatives for raising monies to keep BIF solvent:
1) Change the assessment formula to "total assets-capital", which would shift the premium burden to the banks that impose the greatest risk to the fund.
2) Consider a FICO or Rifco bond option
3) Have the FDIC borrow from the Treasury and have the banking industry pay back over a 10 year period
4) The FDIC could consider borrowing the money from the industry itself.
5) The FDIC could urge Congress to impose a special "risk premium" on those banks deemed "systemically important" by the Federal Reserve.

If you are TBTF(too big too fail) then you should pay for the privilege of 100% government coverage. There are options that need to be explored before imposing crippling special assessments on the community banking industry just at the time it can least afford it. This is only fair as the large banks did not perform due diligence either when they made these loans or purchased them.

Thank you for your time.

Sincerely

Bill Rayfield
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