From: Blake Heid [mailto:bheid@firstoptionbank.com]
Sent: Friday, March 06, 2009 10:08 AM
To: Comments
Subject: Assessments, RIN 3064-AD35

Dear FDIC:

I would like you to consider other ways of raising money for the FDIC fund before allowing the special 10 cent assessment. This assessment could not come at a worse time. When most banks are trying to raise capital levels and loan loss reserves, by assessing additional monies, you could be jeopardizing some healthy community banks that have not had anything to do with this crisis.

A couple of suggestions for raising monies could be:

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 push Congress to impose a special "risk premium" on those banks deemed "systemically important" by the Federal Reserve.

I don’t think we should continue to allow banks to be ‘too big to fail’ because it causes them to take inordinate amounts of risk with what is now taxpayers money, and if you impose this assessment, our bank’s money. If a bank is too big to fail, then they should pay for the privilege of 100% government coverage and that risk they cause. 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.

Thank you for your consideration of my comments.

Sincerely

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