

March 4, 2009

Ms. Sheila C. Bair, Chairman
Federal Deposit Insurance Corporation
Washington, DC 20429

Re: Proposed Special Assessment of 20 Basis Points

Dear Ms. Bair:

This letter is in response to your important message to me dated March 2, 2009. I appreciate the gravity of the issues that precipitated your correspondence. These are difficult times, requiring difficult decisions.

For several reasons I hesitated to comment regarding this proposed special assessment. We are a micro-mini community bank. We know our place in the political food chain. Frankly, I've lost faith in much of our political-regulatory system. I was also reluctant to respond for fear my deep visceral disgust would preclude a tactful articulation of my thoughts.

Owen Community Bank, s.b. ("Bank") of Spencer, Owen County, Indiana, is a federal savings bank with assets totally less than \$100 million. We are accustomed to operating without influence in the towers of power. We do our best. We comply with the laws, treat people fairly, obey our regulators, earn a modest living and actively support the citizens we live with in the community. We do not want hand-outs and will not accept bailouts. We will survive while the once strong and privileged in our industry have fallen to ruin. We are not greedy, but we have a right to prosper from our honest work. We do not look for favors, but we do not like to be played for fools and abused.

I understand that decisions made in our industry today are difficult. We too make hard decisions that impact the lives of struggling customers. And with all due respect, I think we know much better how to effectively assist our friends and neighbors than well-meaning central planners in Washington. Chartered in 1911, this Bank practiced community reinvestment as a business necessity long before it became a political mandate.

The FDIC exists to instill confidence in the insured depository banking system. When the safety and soundness – perhaps literal viability – of financial institutions are threatened by assessment burdens of the FDIC, the agency's mission is clearly undermined. At a time when, despite indiscriminate and irresponsible wholesale condemnation, the army of front-line community banks is being relied upon to seed the economy with life-sustaining commerce, your agency – our "port-in-the-storm", the backbone of the retail deposit system – is preparing to drain critical resources from us.

I don't like the greed, incompetence, bad judgment, cronyism, corruption and irresponsibility that has led us to this point, but I understand that in the course of human events, these things happen in an imperfect world. We must learn from the errors of others and work to deal with the here and now. I can accept this. We must all accept this. But honestly, I can not accept that an institution established to be a source of strength and stability to community banks causes financial hardship at a time of extreme economic uncertainty. Such a move is completely contrary to the purpose of the FDIC.

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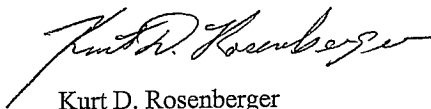
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The argument that using the agency's authority to tap a line of credit at the Treasury Department "could paint all banks with the 'bailout' brush" is weak. What then, is the purpose of the line of credit? Properly communicated, it can hardly be worse than how community banks are currently portrayed as part of the vast herd of financial bad actors.

Nobody welcomes a public relations issue that might accompany a Treasury loan to strengthen the insurance fund. But much worse for public confidence in the banking system is a pattern of community banks failing in small towns throughout the country because their federal regulator thought it prudent to bleed them while they were already weakened.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kurt D. Rosenberger".

Kurt D. Rosenberger
President & CEO
Owen Community Bank, s.b.