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Sent: Monday, March 30, 2009 5:14 PM
To: Comments
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sam_brownback@brownback.senate.gov
Subject: Assessments, RIN 3064-AD35

I am writing in regards to the FDIC announcement of a special assessment of 20 basis points. The Deposit Insurance Fund (DIF) should be adequately funded, however the proposed plan places burdens and additional problems for banks.

I am involved with a small community bank (40 Million dollar) in a town of 400 people in Kansas. It is already a struggle keeping businesses and main streets viable in small communities. Like most small communities, many organizations and community activities look to the local bank for financial support in helping with their activities. This special assessment will affect our ability to continue this support.

The special assessment is estimated to reduce our banks earnings by 17%. This is a substantial impact on top of the already doubled FDIC assessment. In turn this will hinder our ability to fund loan requests.

The FDIC should consider other ways to fund DIF such as a systemic risk premium for "systemically important banks" or an assessment based on total assets less tangible capital. If a solution that more fairly places the burden for this special assessment on those that participated in risky practices is not possible, please consider changes in accounting rules to allow amortizing the special assessment over a period of years (5-7).

Thank you for the opportunity to comment and please reconsider the method of funding DIF.

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