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ROGERS POPE, JR.
President and
Chief Operating Officer

March 30, 2009

Mr. Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429

Attention: Comments

RE: 12 CFR Part 327; RIN 3064-AD35; Assessment

Dear Mr. Feldman:

I am writing in regard to the proposed 20 basis point special assessment contemplated by the referenced interim rule promulgated by the FDIC. Specifically, I am expressing, on behalf of the shareholders, directors, officers and employees of Texas Bank and Trust our extreme displeasure with the proposed rule, and respectfully requesting that the FDIC rescind its proposal.

For Texas Bank and Trust, it is anticipated that the FDIC's 20 basis point special assessment will negatively impact 2009 earnings by approximately \$1,800,000. Based upon our 2009 budgeted earnings, already projected to be down by nearly 20% due to the current economic and interest rate environment, and the resulting "squeeze" on our net interest margin, it is anticipated that the special assessment will reduce our projected earnings by as much as 17%. This is on top of the challenges presented by increases in our regular FDIC premium assessment and the additional premium resulting from our participation in the temporary liquidity guaranty program.

The bottom line is that, for Texas Bank and Trust, our overall FDIC deposit insurance premiums are anticipated to increase from \$357,000 in 2008 to \$2,980,000 in 2009, an increase of over 834% and a negative impact on earnings of approximately 23%.

People Make The Difference

Mr. Robert E. Feldman
March 30, 2009
Page 2

We are aware, of course, of Chairman Bair's promise to reduce the special assessment to 10 basis points provided that Congress enact legislation to temporarily increase the FDIC's authority to borrow from the Treasury from \$30 billion to \$100 billion, but even that amount places the primary burden of recapitalizing the deposit insurance fund on community banks such as ours, which have clearly NOT been a participant in subprime lending and other risky investment practices that led to this current crisis within the industry.

To that end, it is patently inequitable to "penalize" community banks, the vast majority of which have stayed true to the fundamentals of responsible banking and provide one of the few bright spots in the midst of the current economic turmoil. Texas Bank and Trust, like most community banks, is a well-capitalized, common-sense lender that has as its vision to be the leading financial services provider in the communities we serve. The special assessment, regardless of the amount, will only hinder our ability to do so.

We strongly encourage the FDIC to explore other reasonable alternatives for recapitalizing the deposit insurance fund ("DIF") in lieu of the special assessment, and would specifically favor the FDIC using its existing authority to borrow from the Treasury and/or the banking industry, which would help to spread the cost of recapitalizing the DIF over a more reasonable time period.

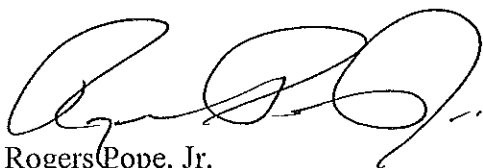
We would also recommend that the special assessment, regardless of amount, should be based upon total assets (minus tangible capital) rather than total deposits, which would place a larger portion of the recapitalization on the banks that pose a "systemic risk" to our industry and the economy and that are primarily responsible for the current problems within our industry. Moreover, using assets minus capital as the assessment base should, based upon public comments made by Chairman Bair, allow the FDIC to generate the same amount of funds for recapitalization through a much smaller percentage assessment. As an aside, it must also be pointed out that most of those banks are already recipients of "TARP funds," which will undoubtedly serve as the primary source of funds through which they will pay the special assessment.

Mr. Robert E. Feldman
March 30, 2009
Page 3

We do admire the work of the FDIC and our other federal regulators in their efforts to manage the current economic crisis, and we would like to reiterate our pledge to assist in that regard. However, we would request in return that all community banks be treated fairly in this process and be recognized by such regulators as part of the solution rather than the problem.

Thank you for the opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Rogers Pope, Jr.', written in a cursive style.

Rogers Pope, Jr.
President and Chief Operating Officer

JRP:gb

cc: Senator Kay Bailey Hutchison
Senator John Cornyn
Congressman Louie Gohmert