

From: Bruce Wilgers [mailto:bwilgers@fidelitybank.com]  
Sent: Monday, March 30, 2009 3:49 PM  
To: Comments  
Subject: Opposition to RIN 3064-AD35: Proposed FDIC Special Assessment pursuant to 12 CFR Part 327

Bruce Wilgers  
EVP/CFO  
Fidelity Bank  
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Wichita, KS 67202-3706

March 30, 2009

Robert E. Feldman  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429

Dear Robert Feldman:

On behalf of Fidelity Bank in Wichita, Kansas, I appreciate the opportunity to comment on the FDIC's interim rule that would impose a special assessment of 20 basis points in the second quarter.

I believe it is important for the FDIC to ensure consumer confidence by maintaining adequate insurance fund reserves but the timing of this proposed assessment is of concern. As you are aware, the financial services industry is in the midst of extreme earnings pressures and this special assessment represents a very significant cost to our bank and the industry as a whole.

When combined with the planned regular increase in the FDIC quarterly premium and all the other challenges to our earnings, this assessment nearly takes some banks out of the game at a time when the government is doing what it can to preserve capital for the purpose of stimulating the economy through increased grassroots lending. This action certainly will not encourage us to do anything but preserve capital.

Currently, there is a piece of legislation sponsored by Senator Dodd which would expand the FDIC line of credit by some \$500MM resulting in a reduction of this proposed assessment to 10 bps from 20 bps. If the Agency determines that it must go ahead with the assessment, it is our hope that the Dodd legislation successfully reduces the impact.

This proposed assessment will have a significant negative impact on our bank and community and I urge all involved to consider alternatives such as the Dodd legislation or perhaps spreading out the cost of the assessment over a longer period of time. Perhaps a convertible debt option that has been discussed by some could be employed.

In any event, it is important that this assessment be modified in some manner to lessen the impact on the financial services industry, the economy and ultimately on the taxpayer.

Thank you again for this opportunity to comment.

Sincerely,

Bruce W. Wilgers  
316-268-7264  
EVP/CFO  
Fidelity Bank

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