

From: Keith Hicklin [mailto:khicklin@wittlaw.com]
Sent: Monday, March 30, 2009 2:31 PM
To: Comments
Subject: Opposition to RIN 3064-AD35: Proposed FDIC Special Assessment pursuant to 12 CFR Part 327

Executive Secretary Feldman:

I am a member of the Board of Directors of Bank of Kirksville, Kirksville, Missouri. As a board member I am responsible for the continued financial strength of the Bank so that it may protect the funds of its depositors and fulfill the credit needs of its community.

The interim rule being proposed by FDIC that would impose a special assessment of 20 basis points in the second quarter is, in my opinion, both ill advised and misdirected. The burden that this assessment will place on healthy well managed banks like Bank of Kirksville is devastating to earnings and unfairly asks our Bank to pay for the poor decisions made by poorly managed or unscrupulous financial institutions.

This knee-jerk response to the current banking problem will have the effect of discouraging sound banks from seeking depositors and increase the cost of credit at a time when affordable credit is most needed.

I understand that maintaining the financial strength of the fund is important but I would urge you to consider the other options available. Surely the use of the FDIC's borrowing authority from the Treasury, using a convertible debt option, spreading out the cost over a longer period of time or a combination of these approaches would be preferable to running the risk of putting healthy banks at risk.

Please consider these comments and I thank you for your consideration.

Sincerely,

Keith W. Hicklin
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