



March 6, 2009

Robert Feldman
Executive Secretary
FDIC
550 17th Street NW
Washington, D. C. 20429

Re: Opposition to RIN 3064-AD35: Proposed FDIC Special Assessment pursuant to 12 CFR Part 327

Dear Mr. Feldman:

Fishback Financial Corporation appreciates the opportunity to comment on the Federal Deposit Insurance Corporation's (the "FDIC") interim rule that would impose a special assessment of 20 basis points in the second quarter. Fishback Financial Corporation fully supports the view of the FDIC that we need a strong, financial secure fund in order to maintain the confidence depositors have in the system; however, Fishback Financial Corporation would strongly encourage you to consider alternatives that would reduce our burden and provide the FDIC the funding it needs in the short term.

The proposed special assessment of 20 basis points is going to be a significant financial burden to community banks. In fact, the total cost to Fishback Financial Corporation, a bank holding company with five (5) separate bank charters in South Dakota and Minnesota, is an additional \$2.5 million, which is substantial related to our budgeted net income. Community banks are already working with a significant increase in regular quarterly FDIC premiums, accounting rules that overstate economic losses and unfairly reduce capital, and regulatory pressure to classify assets that continue to perform – the special assessment is an unnecessary burden on community banks. It will be difficult to restore confidence in the banking system with profits and liquidity reduced this much. It will also inevitably impact regulatory exam ratings and various ratings of banks that are publicized in the national media.

Fishback Financial Corporation therefore strongly encourages you to support alternatives that would reduce our burden and provide the FDIC the funding it needs in the short term, including a reduction of the special assessment and other options to spread out the burden over time. Thank you for the opportunity to comment on the FDIC's interim rule.

Sincerely,

A handwritten signature in black ink that reads "Alan J. Baker". The signature is written in a cursive style with a large, sweeping initial "A" and a distinct "B" for "Baker".

Alan J. Baker
Chief Financial Officer

CC: Senator Tim Johnson
Senator John Thune
Representative Stephanie Herseth Sandlin