## First Federal Bank≮≈

March 9, 2009

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

Attention: Comments RIN 3064-AD35

Dear Mr. Feldman:

As a community banker with over thirty years of experience, I wish to comment on the proposed 20 basis point emergency FDIC assessment, which would be collected on September 30, 2009.

A community bank is focused on serving the citizens within that community. Most of the banks within the U.S. are within this definition of being a mid sized or smaller community bank. We are not striving to serve the global community, but in fact are striving to serve the main street community. The proposed FDIC assessment will critically impact our ability to serve our community.

Our citizens depend upon our ability to make them loans to purchase their cars, purchase their homes, and help with college expenses. They deposit their precious payroll checks and put their faith and trust in our bank. This trust that has been built upon service we have provided. The profit generated from the repayment of the loans builds the bank's capital position and in turn allows the bank to make more loans to more families. This community bond is critical.

Also important to our customers is the FDIC coverage that provides trust in the banking system. Trust that the banking system is regulated, that it is audited and that there is insurance in the event a bank becomes troubled. The FDIC insurance provides a level of confidence for our customers and our bank has paid these premiums to give an extra layer of trust. Together the banking system and the FDIC have cooperated to provide sound and safe banking to our citizens.

The economic cycle we are currently facing has greatly reduced loan demand and has greatly reduced the bottom line profits. Many bank's capital accounts have had a significant decline as they work with borrowers that are facing the inability to repay loans due to job loss. Every effort is being made to reduce expenses while maintaining service to our customers. Any significant expenses that are unplanned become a critical hardship.

Recent actions of the FDIC are now putting significant further strain upon the banking system. Last fall's announcement of a significant increase in the risk based FDIC insurance premiums that begin on April 1<sup>st</sup> has caused many banks significant profitability challenges in itself.

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The proposed 20 bp special assessment now being considered will be unattainable by many banks. The safety and soundness of FDIC is dependent upon its member banks being profitable and building strong capital levels. At this time profitability and bank capital are under high stress and I would implore FDIC to not further exasperate the banks that are already facing profitability and capital issues.

I respectfully request that FDIC seek other means to re-establish its reserves than the proposed 20 bp assessment. I would recommend consideration of the use of the line of credit FDIC has with the Treasury instead of the special assessment. An alternative would be the issuance of longer term bonds that could be backed by the FDIC, which could be repaid over an extended period of time. This extended period would allow a much lower assessment to the member banks.

During these significant economic times I feel it is imperative that we work together to build up the strength of the banks that are operating in a safe and sound manner. For it is the strong community bank that is serving its citizens that will help lead the way to a better economy.

Thank you for your consideration.

Sincerely,

Rick Mann

Senior Vice President

Chief Operations Officer