



# CenBank

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March 6, 2009

Mr. Robert E. Feldman  
Executive Secretary, FDIC  
Attention: Comments  
550 17<sup>th</sup> Street NW  
Washington, DC20429

Re: RIN 3064-AD35

In light of the recent decision of the FDIC to implement the special assessment of 20 basis points on all banks, I have decided that it is necessary for me to write this letter. It is inexcusable that small, community oriented banks are being forced to come to the aid of irresponsible large banks.

For the life of our charter, which dates back to 1893, we have made it our mission to serve the communities in which we are located. We raise deposits locally. We fund local loans to local business people. We are a conservative institution that in no way, shape, or form contributed to the current financial disaster that the "Too Large to Fail" banks have created. But here we are, being asked to contribute an unfair portion of our logically and responsibly created earnings to pay for the greed and erroneous management of banks that operated without regard to sound financial rules.

In addition, it should not go without notice that the FDIC has allowed non-traditional entities access to the valuable insurance fund. These new entities, such as GMAC, Morgan Stanley, and Goldman Sachs have automatically placed greater strain to the fund and increased the burden on the rest of us. Why wasn't there a fee charged to these institutions to gain access to an insurance fund that sound banks have funded for so many decades? It seems logical that greater risk should bring greater premiums as with any other insurance product. This must begin now, before the burden on the sound, well managed banks is too great and the fund is left covering a disproportionate number of high risk banks.

There is no doubt that the solvency of the FDIC is extremely important to the long term welfare of this country's banks. However, I firmly disagree with asking the nations most sound and well managed institutions to pay for the sins of the "Too Large" banks whose management was negligent in keeping basic banking rules on the front burner.

Sincerely,

Don C. Martinez  
President