

March 11, 2009

Robert E. Feldman, Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, N.W.  
Washington, DC 20429

Re: RIN 3064-AD35

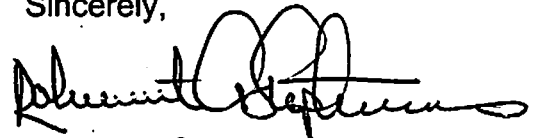
Dear Mr. Feldman:

Community Banks did not cause the economic problems we are facing, so why are we being penalized for the greed, incompetence and sins of the Wall Street Firms that crippled our nation's economy? Community Banks have the capability of pulling our country out of this turmoil but we will be restrained from doing so with a FDIC special emergency assessment.

A special emergency assessment would only weaken our country's strongest link to economic recovery right now - community banks. Just when community banks should be lending to small businesses and consumers to restore stability to the housing market and the financial sector, the special emergency assessment would not free up credit restraints, but rather would have the opposite effect and redirect working capital from the community-at-large to an insurance fund.

The proposed Deposit Insurance Fund (DIF) increase to premium along with a 20 basis point emergency special assessment to replenish reserves to 1.15% over 7 years will place, most assuredly, an undue burden on sound community banks throughout the country. Better to replenish reserves in smaller increments over a 10 or 15-year period, rather than in larger increments, which would severely impact earnings. Or, better yet, why not impose a systemic risk premium on too-big-to-fail-institutions?

Sincerely,



Robert A. Stephens  
Senior Vice President  
Chief Lending Officer