



Donald H. Friedman  
President and CEO

## M Benefit Solutions

Registered Principal offering securities through  
M Holdings Securities, Inc., a Registered Broker Dealer  
Member NASD/SIPC

March 12, 2009

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

Reference: RIN 3064-AD35

Dear Mr. Feldman,

On behalf of M Benefit Solutions – Bank Strategies, I respectfully submit the following comments regarding the Federal Deposit Insurance Corporation's (FDIC) proposed rule with respect to deposit insurance assessments. We appreciate the opportunity to address this important issue and to voice our opposition to this proposed rule as it is currently written.

M Benefit Solutions – Bank Strategies provides Executive and Director compensation consulting and related financing solutions to community banks. It is our business to help banks effectively recruit, reward, retain and retire their best and brightest, and to accomplish this in a fiscally efficient manner. We understand the mechanics of the community bank's financials and believe this regulation would be devastating.

We strongly support exploring all alternatives for funding the Deposit Insurance Fund (DIF) rather than charge the special assessment. There are other options including borrowing from the Treasury, issuing debt instruments or borrowing from the banking industry. Analyzing these options should be done before any final decision is made that could be potentially detrimental to the community banking industry.

In these turbulent economic times, we are fortunate that our primary customers, community banks, are vibrant and healthy. The majority of our current and prospective bank clients are well-capitalized and in the unique position to help the economic recovery. These community banks did not participate in risky and speculative practices that led to this economic crisis, but would be penalized with this special assessment.

On a practical note, if any special assessment is ultimately charged, we support a change in the accounting rules that allow banks to amortize the assessment over a period of years.

While funding the DIF is important and essential, we believe the current proposed solution to be flawed and ultimately destructive to the community bank industry. We also believe the continued health and well-being of the community bank industry is essential to the recovery efforts of our economy and to our country.

Thank you for consideration of our views.

Sincerely,

Donald H. Friedman