



# CORNHUSKER

## BANK

March 9, 2009

Robert Feldman, Executive Secretary, FDIC  
550 17<sup>th</sup> Street, NW  
Washington, D.C. 20429  
Attn: Comments

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

Dear Mr. Feldman:

I am taking this opportunity to comment on the FDIC's interim rule that would impose a special assessment of 20 basis points in the second quarter of 2009. While I fully support the view we need to maintain a strong, financially secure FDIC fund in order to maintain the confidence depositors have in the system, I do have serious concerns about this proposal.

The special assessment is at odds with Cornhusker Bank's efforts to help maintain our community's financial health during this economic downturn. The assessment cost is so high as to be a disincentive to raising new deposits. Fewer deposits will hinder our ability to lend. Any reduction in earning makes it harder to build capital when it is needed the most. If we are forced to look at avenues to lower the cost of other expenses in the bank, it may limit our ability to sponsor community activities or donate to charitable organizations we have supported for many years.

The implications of this significant FDIC assessment have the possibility of impacting every corner of our community. It is harmful to burden a healthy bank, such as Cornhusker Bank, which is positioned to help the economy recover. Given the impact this proposed assessment will have on Cornhusker Bank and the Lincoln and surrounding area's economy, I strongly urge you to consider alternative to reduce our burden and provide the FDIC the funding it needs to remain strong in the short term. I strongly urge you to consider more reasonable funding options, such as reduction of the special assessment over a longer period of time, using the FDIC's borrowing authority with the Treasury for short run funding, or using revenue the FDIC is collecting for the Temporary Liquidity Guarantee Program to support the FDIC at this critical time.

Making these modifications will ensure the fund remains secure and will allow Cornhusker Bank to continue to lend in our community. I urge you to take these suggestions into consideration when the board meets in April to finalize the special assessment rule.

Sincerely,

Sherla M. Post  
Vice President – Human Resources Director

