

From: Kelly Graham [mailto:109302@usd230.org]
Sent: Saturday, March 07, 2009 9:01 AM
To: Comments
Subject:

Dear FDIC:

Please consider other ways of raising money for the FDIC fund before allowing the special 10 cent assessment. While much better than a 20 cent special assessment, even a 10 cent assessment would equate to approximately 12.5% of my banks annual net income. Wall Street creates a financial fiasco and my bank in Kansas has to pay for it? That doesn't seem equitable to me.

While I don't have the answers, shouldn't the banks deemed 'to big to fail' be forced to carry the bulk of the FDIC recapitalization burden? A special charge for 'systemically important' banks seems to be a good first step in the right direction.

Additionally, I have often wondered why any bank was forced to include Public Funds in the total deposit calculation for FDIC premiums. These deposits (above the FDIC limit) are clearly not insured and receive no benefits from FDIC. That is why we are required to pledge securities, issue irrevocable letters of credit, etc. for these types of accounts. Charging FDIC premiums in effect makes any bank pay twice for these deposits which in turn lowers the rate that a bank can pay these public entities. In today's tough economic times that is the exact opposite of what our towns, cities, counties, and school districts need.

Thank you for you consideration to this important issue for the entire industry.

Cordially,

Kelly Graham