



April 1, 2009

Mr. Robert E. Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429

Dear Mr. Feldman:

On behalf of the National Federation of Independent Business, the nation's leading small business advocacy organization, I am writing you in regards to the Federal Deposit Insurance Corporation interim rule on special assessment [RIN 3064-AD35]. This rule would impose a 20-basis-point special assessment on all domestic deposits as of June 30, 2009 to help recapitalize the Deposit Insurance Fund (DIF.) There is great concern that if the DIF declines it could undermine public confidence in federal deposit insurance. This rule has far-reaching implications that would adversely affect small community banks and many other small businesses across the country.

Community banks need to be able to lend to small businesses in these troubled economic times. According to the NFIB Research Foundation's 2005 National Small Business Poll on Bank Competition, 48 percent of small business owners are customers at banks with less than \$1 billion in assets. These community banks help fund small business growth and they are the best equipped financial institutions to help rebuild the economy. One NFIB member, in particular, commented that his bank only profits about \$400,000 a year, but this assessment is estimated to cost him nearly \$80,000. This money could be better used to grant loans or extend credit lines to credit-worthy to local businesses.

The current 20-basis-point special assessment is a major hit to community banks. As proposed by other associations like the Independent Community Bankers of America, spreading the burden of the assessment based on total assets or exempting those banks holding limited deposits would help community banks and the entire small business community much better than a one size fits all rule.

Please be certain to keep community bankers and small businesses in mind when developing future assessments. We look forward to working with you on this important small business financial issue.

Sincerely,

A handwritten signature in black ink that reads "Susan Eckerly". The signature is fluid and cursive, with a long horizontal stroke at the end.

Susan Eckerly  
Senior Vice President  
Public Policy