From: gpannerlewis@gmail.com [mailto:gpannerlewis@gmail.com] **On Behalf Of** G. Lewis
Sent: Friday, March 06, 2009 9:59 AM
To: Comments
Subject: Assessments, RIN 3064-AD35

Dear FDIC:

Please consider other ways of raising money for the FDIC fund before allowing the special 10-20 cent assessment. By assessing additional monies, you could be jeopardizing some healthy community banks that have not had anything to do with this crisis.

Our bank in particular is in the best shape we've ever been in (loan problem-wise), except we're sitting at just above 7% in capital due to rapid growth. Our growth has been due to a failing competitor and the new accounts that have come with their problems. We may need to borrow additional monies for capital at a time when our holding company debt is already fairly high. This special assessment will cost us one to one and half month's worth of net income, which could not come at a worse time. Please consider some alternatives below.

A couple of suggestions for raising monies could be:

1) Change the assessment formula to “total assets-capital”, which would shift the premium burden to the banks that impose the greatest risk to the fund.
2) Consider a FICO or Rifco bond option
3) Have the FDIC borrow from the Treasury and have the banking industry pay back over a 10 year period
4) The FDIC could consider borrowing the money from the industry itself.
5) The FDIC could push Congress to impose a special "risk premium" on those banks deemed "systemically important" by the Federal Reserve.

If you are TBTF(too big too fail) then you should pay for the privilege of 100% government coverage. There are options that need to be explored before imposing crippling special assessments on the community banking industry just at the time it can least afford it.

Thank you for your consideration to this serious situation.

Gregg P Lewis, Chairman
First Option Bank
Osawatomie, Ks
glewis@firstoptionbank.com