
From: Jana Jantzen [mailto:janaj@fnbliberal.com]
Sent: Wednesday, March 04, 2009 3:38 PM
To: Comments
Cc: info@icba.org
Subject: Special Deposit Assessments

To Whom It May Concern:

The decision of the FDIC to substantially increase the FDIC premiums to community banks is not only totally unfair, it is punitive. The mega-too-large-to-fail "financial institutions" have been given free reign to do whatever they want and in the process have brought the economy to its knees. Don't they have regulators? Our bank does! And then community banks are told the big, important "banks" don't have to be responsible for their share because "shifting more of the premium to higher-risk banks would be a burden." Excuse me? Oh, and by the way, let's give them more federal money to mismanage, but don't put any federal money into the FDIC fund that protects the deposits of taxpayers because it will "run the risk of having all banks painted with the 'bailout brush'." NOW we're worried about what people might think? It's a little late for that. Putting taxpayer money into the FDIC funds makes more sense than giving it to a few too-large-to-fail-mismanaged financial institutions. I think taxpayers will recognize the difference. And yes, banks have always been responsible for funding the FDIC reserves. Back in the 80's when bank closures were happening on a daily basis, banks took care of it. And troubled banks, by the way, were assessed the highest premiums. But this time, the government stepping in and handing money out to a select few has changed the equation. I have been in the banking business for over 30 years, the majority of my life, and now the rules have changed. It's a whole new ballgame.

We are a strong bank. We are a community bank. We make loans. We pay our FDIC premiums. We maintain an adequate Loan and Lease Loss Reserve. Community banks across the country are doing their best to help make the local economies better through these difficult times. When jobs of customers are lost through no fault of their own, and payments cannot be made, the community banks will be expected by regulators to maintain adequate reserves to responsibly take care of these "bad" loans we made. Adding these horrendous premiums will be a burden to us, too. Community banks don't make millions and millions of dollars, or pay millions of dollars in bonuses. If all or a large portion of income must be channeled to reserves and premiums for several years, how long will the community banks survive? I don't see the government stepping in and giving them money. I see another "*Regulators Close Bank*" headline in the news. Then again, maybe *that IS* the agenda and this is an easy way to get there. I hope not.

Jana K. Jantzen
Senior Vice President

First National Bank
1700 N. Lincoln
Liberal, KS 67905
(620) 624-1971