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**From:** Leif Berg [mailto:lberg@fnbordway.com]  
**Sent:** Wednesday, March 04, 2009 4:30 PM  
**To:** Comments  
**Cc:** nfo@icba.org  
**Subject:** FDIC Special Assessment

To Whom It May Concern:

The proposed "Special Assessment" by the FDIC has many ramifications on smaller community banks. The FDIC assessment for 2009 has already been increased to help offset the additional losses being taken as banks are being closed. I realize additional losses are projected in the banking industry and money must be raised to offset the losses, however an additional 20 bp charge will unduly handcuff many banks earnings at a time when many banks need to offset losses or expand their reserve for loan losses. Placing such a large burden on all banks, because of the transgression of a few, in a time of crisis is going to add to the problems in the system, not cure them. Many small banks are already feeling the pinch from tightened margins and lesser earnings. Adding such a large assessment on top of what is already being collected could accelerate the financial decline of institutions which are already struggling. Small Banks have a hard time generating earnings due to the lack of economies of scale. Smaller institutions don't have the benefits the larger institutions receive from those economies, and therefore increased earnings potential. However, you are proposing placing a heavy burden on the smaller institutions, which they may not be able to bear. Please reconsider the size and scope of the additional assessment and take into consideration the industry including the smallest institutions.

Sincerely,

*Leif R. Berg*

1st Vice President

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