
From: Joe Dorsey [mailto:JDorsey@CBBFLA.com]
Sent: Wednesday, March 04, 2009 4:27 PM
To: Comments
Cc: info@icba.org
Subject: Assessments, RIN 3064-AD35

Dear Chairman Bair,

Last month I was in Washington with the Florida Banker's Association group and met with members of your office at your headquarters. (Thank you for the tasty luncheon) We had a very good conversation and I thought our message was well received by your representatives.

I KNOW that you and the FDIC are trying your best to combat our economic crisis and you have come up with many good ideas for the President to consider. I hope he and his advisors eventually listen to you and take to heart your mortgage relief thoughts. I think that they will work!

I write you today about the proposed FDIC "Special Assessment", which in my humble opinion, is ill-conceived and just the wrong thing to do, at the wrong time!

I totally understand the government's mandate to the FDIC to keep its pocket book in balance, but to try to do it one large 20-cent special emergency assessment is just plain suicide for some banks. Even pitch man Ron Popeil will sell you his Ginsu steak knives in "three easy payments" in order to make a sale. Why can not the FDIC do something similar or in these precarious times, take a tad longer before having to rebuild your fund balance? Members of Congress will just have to deal with FDIC's request, if made, to stay the execution of RIN 3063-AD35 for the time being.

You have some incredibly brilliant people working for you, but who do not work out here in the trenches. Perhaps they may be unaware of the long term reactions and financial ramifications at the Main Street level of trying to balance the FDIC's books in one special assessment, in order to have the FDIC stay in compliance with Federal regulations.

We banks, like you, must always be in compliance with all regulations. However, someone much wiser than I once said, "Desperate times calls for desperate measures", and right now may be a time to "bend the rules" a bit, in order to help the many FDIC insured Community Banks help you bring our country back into prosperity.

Now is NOT the time to slap FDIC insured Community banks, which had little to do with creating the current economic situation, with a huge premium assessment

and impede our efforts on the local level to make you look good!

I also had the pleasure to meet with Chairman Reich who also took time to meet with our FBA group. He, being a former banker, perhaps better understood our concerns and was the only person, I understand, to vote against this measure. Ms.

Bair although he is leaving his position at the OTS, I personally believe that he was right in his assessment of this special premium.

I humbly request that the FDIC's decision on RIN 3064-AD35 be either repealed or amended to allow for a greater time limit to help get your books (and ours) back in order. We all want is best for our country and our FDIC insured banks!

Thank you for listening to my concerns today,

Respectfully,
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