
From: David Brewer [mailto:brewerd@ffsb.com]

Sent: Friday, March 06, 2009 7:39 AM

To: Comments

Subject: Assessments, RIN 3064-AD35

We do not support the 20 basis point assessment. Other alternatives exist to more equitably spread the cost to those who caused the problem. Perhaps a fair alternative would be to assess the fee based on a combination of 1-4 family securitization originations in the past 36 months and asset size. Alternatively, FDIC could issue bonds, not unlike what FSLIC did in the 1990 S&L crisis and charge the debt service to the banks using a fair allocation method. Regardless of the method chosen it must cause the costs to fall on those who made this problem what it is and not be charged to those of us who were bystanders.

We do not feel that raising costs to community banks in this economy is a wise course of action. Furthermore, we believe that when economy improves anyone who paid a special assessment should be given a credit against future assessments.

David Brewer, CPA

Vice President\ Chief Financial Officer

First Federal Bank of Florida

P O Box 2029

Lake City, FL 32056-2026

brewerd@ffsb.com

386-755-0600 x3920