From: David Werner [mailto:dwerner@cbtfl.com]

Sent: Thursday, March 05, 2009 10:51 AM

**To:** Comments

Subject: Assessments, RIN 3064-AD35

## Dear FDIC board:

While I realize that insurance programs seek to spread the risk across the entire participant base, I am offended at the apparent lack of oversight into many of the large bank's lending and investment guidelines leading to the current failure rate of larger banks. I am also concerned about the length of time it takes to shut down poorly performing banks, such as one in our area that made poor lending decisions for years before any punitive action was taken, costing the fund some \$90MM.

Clearly, a new premium assessment structure needs to take place.

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