From: Debra Miles [mailto:dmiles@dartbank.com]

Sent: Thursday, March 05, 2009 9:15 AM

To: Comments

Subject: New Premiums

FDIC -

I understand balance shortages. I understand your need to replace the reserves, but what I don't understand is how you think that most community banks can do what your asking. Our budget this year was for 1.4 million dollars. You are asking us to give you 50% of that budget in premiums. If you want banks to survive, wouldn't it be more prudent to make sure that we are "beefing" up our reserves. Prior to your announcement we had decided to take and appropriate more that we had originally accounted for in our budget to our reserves. Now, it should go to you? If we make less income and our ratios continue to struggle we will owe you more anyway. All the credits from previous years are gone! If you are estimating right I would think after the first quarter with the increases you have already employed that you should be looking good. We have not passed these premiums onto customers and with many other small community banks. BIGGER banks have. Our correspondent is now charging us for their premiums. So to be competitive in the market we get hit twice. Be careful that the very method you employ to save your reserves doesn't end up depleting them by causing the small bank on the corner to fail. Talk to us. Ask us for solutions. But don't weaken our Capital and Earnings by causing any minor money we might bring in to go directly to you. Thank you for listening! Please call, I'd love to chat.

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