

April 2, 2009

Robert E. Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street N.W.  
Washington, DC 20429

RE: RIN 3064-AD35

Dear Mr. Feldman:

I am writing today to offer our comments on the interim rule to impose a 20 basis point or possibly 10 basis point emergency special assessment under 12 U.S.C. 1817(b)(5) on June 30, 2009. Although the Deposit Insurance Fund (DIF) may be suffering from increased losses, this special assessment may do more damage to insured institutions than the benefits attained.

As a mutual institution and primarily portfolio lender we have not been insulated from the impact of unemployment and crashing home property values. The Capital that we maintain comes from many years of service to our communities. This environment has a huge impact in our ability to maintain the same level of capital.

I know that there is little likelihood of our institution ever getting the benefit of TARP funds. At the same time, we see billions of dollars being dumped into financial institutions that will most likely have no impact on the communities that we serve.

And now the FDIC is considering a restoration plan which will essentially reduce our capital and thereby weaken our ability to offer services that are consistent with the needs of our communities.

Moreover, our mutuality does not give us the ability to cut dividends as we do not have shareholders. What we do have as clients, are loyal blue collar workers or seniors on fixed income. The impact of this special assessment could mean lower interest rates on deposits and higher rates for loans.

We were recently awarded an "Outstanding" rating for CRA. This rating reflects our commitment to this low to moderate income communities that we serve. The plan to impose a special assessment, we believe, is unworkable and would only undermine efforts to expand credit availability to these communities.

We urge you to consider other alternatives. At a time where capital may signal the survival of many institutions, this special assessment can be nothing but counter productive.

Respectfully Submitted,

Mark T. Doyle

CEO/Chair