From: Dave Gaddie [mailto:dgaddie@bankrepublic.com]

Sent: Monday, October 05, 2009 11:37 AM

To: Comments

Subject: Prepaid Assessment Plan

To Whom It May Concern:

I realize the difficult position that the FDIC is in with hundreds of troubled banks and bank take over's happening every week. Having said that I do not think it is fair or necessary to require banks to pre pay three years of insurance premiums in these difficult times. What would be wrong with a one year pre pay at t a time program, it allows the banks to maximize our earning assets and provides the agency with significant cash payments each year through 2012. If the agency has a short fall because of bank failures between annual payments, borrow from the Treasury Line of Credit and repay when the next year's assessments are paid.

The healthy banks in the country are working very hard to stay healthy and anything you can do to help and balance your needs will be very much appreciated.

Thank you.

David Gaddie President/CEO Republic Bank Duluth, MN 55802