First State Bank

March 23, 2009

Mr. Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D. C. 20429

Attention: Comments

Re: 12 CFR Part 327; RIN 3064-AD35; Assessments

Dear Mr. Feldman:

As background I am CEO of an independent community bank in North Central Texas with assets of one hundred twenty million and loans of sixty million. I have been in the financial services industry for thirty-eight years. During these years I have seen the best and I thought the worst, until this past year.

As a small independent bank our goal has always been to service our customers and community while creating value for our shareholders. As with most independent community banks, we have been conservative lenders while striving to maintain strong capital and liquidity. **We have to manage responsibly because this is our business, our capital, and our future**.

Most community bankers have done a good job of running their banks and have not engaged in the types of risky business practices that have brought on this financial meltdown. However, innocent we may be, we are all suffering as the Fed has taken interest rates to historic lows which have caused our investment income to drop dramatically and we now need to bulk up our reserves and capital to offset potential losses brought on by this financial crisis. Now we are being asked to "pony" up for this unprecedented one time assessment to bail out the "big guys" again.

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Initiatives the government has undertaken through the years has been for the benefit of the financial giants or the "too big to fail" institutions. These are the same ones along with the Wall Street firms that have been the major contributors to the collapses that have placed our industry along with the entire economy in jeopardy. Anytime a bank, insurance company, or any other business becomes too big to fail, then it is probably too big.

As an American citizen, taxpayer and businessman I am mad, frustrated and disgusted that this has been allowed to happen. As a independent community banker I am **totally opposed** to the assessment being placed on our industry for the benefit of those who were allowed to go unregulated and operated outside of sensible business guidelines. Not only am I adamantly against this assessment being proposed on community bankers but I believe it is time for the independent community banks to be separated from the giant behemoths. There should be little question that they pose a higher risk to our financial system and obviously need closer supervision. Independent community banks operate differently and certainly pose less risk to our insurance fund. This will especially be true in the future since bank holding company status has been granted to so many non-bank entities. I think the time is here to re-organize the regulatory structure and their responsibilities. F.D.I.C. should explore restructuring the deposit insurance fund so it would be based on asset size as opposed to deposits and there should be separate funds within the F.D.I.C umbrella where the institutions that are smaller and pose less risk are separated from the large institutions.

Independent community banks have always been the backbone of our communities and the under-lying strength of the financial sector. We are the ones at the grass roots that are still loaning money and providing financial services across the United States.

Whatever the outcome of our current crisis, I hope that government leaders, regulatory agencies and our industry learn from past mistakes and put in place the necessary safeguards that prevent a situation like this from ever happening in the future.

Yours truly,

Jay M. Gober
Chairman/CEO

Cc: Senator Kay Bailey Hutchinson
Senator John Cornyn
Congressman Randy Neugebauer
Chris Williston, IBAT
Rick Smith, TBA