

From: Dean Abercrombie
Sent: Tuesday, March 03, 2009 7:05 PM
To: Comments
Subject: 20 Basis Point Assessment

Dear Sirs:

I am amazed that the solution the FDIC has come up with to solve the potential exposure with major bank failures is to assess a special charge to all banks, knowing that for the most part the liquidity problems the bank failures may cause were not the result of the actions of the Community Banks themselves. To be fair, the special assessment should be assessed to the Banks dependant upon their own risk using CAMEL ratings or something much more tied to that Banks contribution to the problem in the first place.

We are a small (just over \$100 mil) well performing Community Bank that has worked hard to continue to operate with profits, to grow within reasonable rates, to continue to be well capitalized, to have come out of our latest FDIC exam with all [***] ratings, having only one low [***] loan delinquent over 30 days (and brought current within a few days after that) and having only one classified loan in the entire portfolio. Our reward for doing things "right" is to be hit with a large assessment just the same as what the major banks that are responsible for the current situation also have to pay and they are the only ones that benefit from these efforts.

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