

From: Agee, Jeff [mailto:jagee@firstcitizens-bank.com]
Sent: Monday, March 02, 2009 5:57 PM
To: Comments
Cc: info@icba.org; timamos@tnbankers.org; tcarmack@tnbankers.org
Subject: FDIC Special Assessment

As the President and Chief Executive Officer of a successful community bank, I am very disturbed by the proposal of a special assessment on the entire banking industry by the FDIC. I must say I agree with Camden Fine, President and CEO of the Independent Community Bankers of America, when he says this sharp raise in premiums “will be detrimental, especially to the community banking industry, which will share a disproportionate burden of that increase”.

Being a banker, I understand the position of banks in the United States at this juncture. I also understand most of these problems were not created by independent community banks that adhere with traditional banking principles. We are the basis of Main Street. We are the banks that hometown folks have depended on for many years not only in a deposit/lending capacity, but also as vital contributors and leaders of our communities. To bring the undue and unfair burden of this assessment on independent banks affects the whole citizenry.

Although many have made the point, I would like to reiterate that most independent banks did not participate in the sub prime lending fiasco. Good, traditional credit considerations were kept in place. Our bank is lending money, but we follow the conservative philosophy of lending to customers with a good history with our bank, good credit standing and an ability to repay. Our bank made a profit last year, and we have not taken any government funds. Most community banks are in this same position.

Main Street is still relatively solid, and we would like to remain in that position. We are ready to stand by the people of this country and assist in economic recovery. I respectfully request that community banks not be handcuffed by any assessment to be applied **to all** banks instead of only to those who participated in highly leveraged activities and brought down Wall Street.

Your consideration is greatly appreciated.

Sincerely,

Jeffrey D. Agee
President and Chief Executive Officer