From: Wm. C. Cushing [mailto:dnbwcc@nckcn.com]

Sent: Monday, March 09, 2009 11:59 AM

To: Comments

Subject: Assessments, RIN 3064-AD35

Board of Directors:

I just wanted to comment that I find it unconscionable that you have seen fit to assess us a 20 basis point increase, and hold the ability to assess us another 10 point fee, on top of already adding to our regular assessment. I could understand the increase in the quarterly fee since it was lowered years ago after we cleaned up another mess but the "penalty" fee is hard to figure. I watched the meeting of Feb. 27th on the internet and saw the discussion and all to a man said it could be very damaging to the only Banks that were doing the right thing then went ahead and did it anyway, except for Mr. Reich.

I could certainly understand this action should we have fallen into the temptation of greed in making investments and the stupidity of taking on risky ventures, making home loans that could never be repaid, taking great chunks of \$\$ out of circulation by way of bonus and salaries, etc.

However, we did none of those things, rather looked into what our mission was. Our job was, and is, to be a viable entity that can sustain our main street, our farmers, our wage earners, our schools, and our elderly and support our CRA assessment area of our counties that we pledge to serve.

In order to do that, we had to make a choice to not take on risk to gain income and growth or we might not be here to do those things if they fell apart. In doing so, we knew that our income would be flat and we would have to manage our money very tightly, which we did and in the process increased our capital by 25% of our earnings every year since 2006.

We were proud to say that we didn't sign up for taking any of the Governments money to bail us out or insure deposits as we had operated in a way that didn't require bailing out.

Now we are faced with the fact that having done those things, to make sure we did what Banks are supposed to do, we are going to get hammered by your group to pay for those that cared not one bit for the things mentioned above.

Never in 35 years of Banking did I ever think doing the proper things to make sure our customers were safe would lead to this.

It is going to be extremely difficult to continue our lending as we have, let alone support financially the Senior Center, Girl Scouts, Schools, Community Projects etc. with having to absorb your assessments.

Sincerely,

Wm. C. Cushing President Downs National Bank Downs, KS