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There are really three kinds of banks in the U.S. today.

1. Very large banks that foolishly allowed their capital to shrink to inappropriately small levels, overleveraged their balance sheets with non-depository funding, and took excessive risks in their loan portfolios.

2. Banks started in the last 10 years or so whose common business model has been construction-based loans funded with brokered deposits, high-cost CD's, and high-cost money market accounts – all otherwise known as "hot money".

3. And thirdly, many, many, many banks that have operated in safe and sounds ways – maintaining adequate capital, funding their balance sheets appropriately with primarily deposits, and controlling loan quality.

Our regulators failed to do their job in regulating a large group of big banks who took on excessive risks with too little capital, too much leverage, and too little control of their asset quality. Our regulators, also failed to adequately supervise the de-novo banks who didn't have a business model that could withstand a business down-turn. These are the banks that either have failed, or are in danger of needing FDIC assistance. They have dragged the U.S. economy into a very deep recession which is hurting ALL banks.

And so, the FDIC in their infinite wisdom, proposes taxing many, many, many strong banks that have followed the rules and operated in safe and sound ways, but are struggling due to the economic downturn, by further reducing their earnings by raising FDIC insurance premiums to pay for the mistakes of the largest banks and the de-novo banks. How can I say it any other way – this is just WRONG! We are handing hundreds of billions of dollars to these banks to bail them out and keep them afloat. It seems that a far better use for taxpayer money would be to finance the FDIC's losses as they clean-up the messes that have been created by the "bad actors". The "good actors" shouldn't bear the burden – we are already paying it in the recession that has been generated by the "bad actors".

Not sure how to technically accomplish this, but the FDIC's losses should be tax-payer borne at this point rather than potentially driving some of our nation's stable banks further toward the brink.