

From: Mims, Alan [mailto:AMims@bankccb.com]
Sent: Tuesday, March 03, 2009 10:20 AM
To: Comments
Subject: Special Assessment

Chairman Bair and FDIC Board,

Please reconsider your decision to levy a "Special Assessment" upon banks to replenish FDIC's reserves. This move, while deemed necessary by you, is so far-reaching and unfair that it must be reversed. The effect of your decision is to deem Community banks, such as CCB Community Bank, "systemically unimportant" that we must bear the weight of the poor choices and greed of the mega-banks that have brought our current economic woes upon us.

Community banks, by and large, did not participate in the wantonly greedy practices that were chosen by Wall Street banks. We have served and continue to serve our customers with loans and services that we have historically provided. Even in difficult times, we continue to lend and assist our customers as they deal with uncertain economic realities. Your assessment, though, will bring about unwanted consequences as we must direct funds which would otherwise be available to our customers to taking care of problems we DID NOT create. I personally find it offensive that the banks that are doing all they can to give Main Street and rural America a hand up, got the back of the hand from their own government on the same day that Citi was getting a hand out! And yesterday AIG got another \$30 billion helping of taxpayer money.

I feel certain there are other, less offensive means to replenish reserves. The FDIC could change the assessment based upon which premiums are calculated to bring more equity to the assessment process. The FDIC could vigorously push Congress to enact legislation to allow it to levy a special assessment on the largest "systemic risk" firms. The FDIC could tap temporary funding from the Treasury (like the big Wall Street firms are doing by the bushel basket full) to re-capitalize the insurance fund, giving Main Street banks time to strengthen their balance sheets and allow local lending activities to continue (and grow) to help our struggling economy recover, rather than constrict lending further by imposing a painful new debt obligation on already burdened balance sheets. To add insult to injury, this new burden falls disproportionately hard on the community banks of Main Street America.

Please reconsider this unfair decision.

Alan L. Mims, CPA
Executive Vice President
CCB Community Bank
P.O. Box 400
Andalusia, AL 36420
334-222-8583 (direct)
334-427-4381 (fax)
amims@bankccb.com