

**From:** Kirk Penner [mailto:kirkp@seymourbank.com]  
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While it is imperative for the banking industry to maintain the FDIC fund in an amount and sufficiency of which that instills confidence in the general public, I believe what is lacking in the decision made by the Board of Directors of the FDIC is a fairness with regard to those financial institutions which have recently been made banks and thus covered under the FDIC umbrella. These former "non-banks" have not paid any previous premiums to the BIF and as they have been now made a part of traditional banking, I believe a special assessment with regard to those institutions is warranted. In addition, since you cannot per statute require larger more systemically important institutions to pay a separate assessment rate, I believe that since some have experienced government salvation we should regard this as a catalyst for justifying the additional premiums placed on them due to their systemic importance. It seems to be clear that the government does not intend for these institutions to be placed into receivership and thus perhaps a separate insurance funding mechanism might be justified for those institutions.

In closing, I want to state that I support the FDIC in their activity in this crisis and believe that the banking industry must support deposit insurance. This process, however should be fair with regard to the aforementioned.

Thank you very much for your consideration.

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