

Ms. Sheila Bair, Chairman
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429-9990

October 26, 2009

Subject: Proposed FDIC three-year assessments

Dear Ms. Bair:

I appreciate the opportunity to comment on the above subject. However, there is more to strengthening the American banking industry than the short-term efforts of replenishing the FDIC fund. We need a long range, proactive approach to cure the chronic ills of cyclical downfalls in our banking system. How many times has Citigroup, Inc. and its predecessors received government assistance? At a minimum we need:

- A stronger industrial capital base that reflects a minimum tangible net worth of every financial institution of at least 15% or more. This would be just the starting point.
- A methodology to determine every American bank's systemic risk not only to the American banking industry but to our economy and assess those risks in relation to the health, viability, and stability of the insurance fund.
- Be transparent and rank the risks accordingly so that the American public knows the degree of exposure to their deposits in any one given financial institution. Similar to the way we grade fixed income securities.

I believe that you, your board and your colleagues on the FFIEC Board are in the right place and at the right time to create your own legacies, something to be proud of as you advance into other endeavors.

Respectfully,

J. R. Dickson, CEO
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