

3/6/2009

ROBERT E. FELDMAN, EXEC. SECRETARY  
ATTENTION: COMMENTS  
FDIC  
550 17TH STREET, N.W.  
WASHINGTON, D.C. 20429.

RE: Assessments, RIN 3064-AD35

Mr. Feldman, it has been several years since I have taken the time to self compose and send a letter on our letterhead. I have been a banker for 35 years – starting here just prior to completing my undergraduate degree. I am the 4<sup>th</sup> CEO of this bank– following my father, grand father and great grandfather who was one of the organizers

This bank is in very good condition – fortunately we are in a well diversified and growing community. Many of my banking friends are not as fortunate.

The proposed special assessment of 20 basis points is unfair to the community banks who didn't participate in activities we hear about in the media today.

I strongly recommend the FDIC consider:

- Reducing the proposed special assessment as much as possible - to 10 percent or less.
- Base the assessment on total assets minus capital instead of deposits
- Promote making permanent the temporary level of deposit insurance
- Track the special assessment(s) with premium credits to banks when the reserve fund approached its target balance – much like the credits we received during the recent several quarters.
- Research the possibility of a separate deposit insurance fund and process of regulating any institution that is so large they pose systematic risk.

I welcome you to contact me to discuss this further.

Best wishes,



H B Pomeroy, President

Cc Congressman David Obey