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**Subject:** FDIC Assessment

I'm sure all of the comments received concerning this matter have mentioned how community banks played no role in the current economic crisis and have expressed amazement that we would be punished by being responsible for solving somebody else's problem. You can add my name to that feeling.

I've been in banking since the mid 1980's and I remember in 1987 as a young banker listening to comments from the regulators stating that fewer and larger banks would be easier to regulate. I started doubting my career choice as I saw hundreds of bank consolidations and the overall number of banks dropped from 14,000 to the mid 8,000's.

During that same period I watched the large mega banks that theoretically should have been easier to regulate invent new investment vehicles, however they seemed to be off the radar screen of all regulators. As a result our industry I began to see our industry change. Non-interest income became king and pressure was put on our net interest margins our traditional business model began to change. We were encouraged to join in this new revenue opportunity and a new industry was born – "revenue consulting".

These new investment vehicles took off and the resulting product came on the scene so quickly that they were really not understood, but they were sold based on the lure of above market returns. Our examiners scrambled and we suffered through expensive interest rate risk examinations and resulting regulation of the early 90's even though we had little to no involvement. We endured and survived – we expressed concerns about the lure of above market returns to our examiners and nobody seemed to listen much less care.

These investment vehicles got a boost in the late 1990's as credit underwriting standards were lowered by government agencies. Community banks were thought of as non-caring because we were concerned about a person's ability to repay and actually had the nerve to ask for a down payment. We expressed our concerns about underwriting throughout the 2000's as we lost market share and still nobody listened.

And now this, the non regulated banking product designed by mega smart mathematicians employed by the mega banks, products that nobody understood but were afraid to criticize because it was not politically correct to do so has finally caught up with us. We shouted all along the way and nobody listened. Now you are asking us to fix the problem created over the past 20 years that we saw coming but were considered to unsophisticated to understand. If you decide to impose this tax, we will find a way to survive because that is what we do. We believe in what we do and we are what we do. We are hear for our communities with out CRA legislation, we do not discriminate when making lending decisions without legislation imposed on us, we do not create complicated investment product without being legislated not to so. We believe in making a fair net interest margin, providing customer service as if we were taking care of our Mother, and we believe in the concept of fractional reserve lending and the benefits it provides to our community.

Fortunately I have been mentored by some of the greatest bankers to have ever worked in our industry and the one of the greatest lessons taught is not to complain unless you had a solution. So if you care to read on hear goes my solution:

Separate the 12 largest banks in the United States from the rest of us. Nationalize them if you want we would look forward to competing against them. The remaining 8,300 or so would form a partnership creating a bank privately owned by us, funded by our dollars currently being sent to the FDIC and by the dollars current being sent to the United State

Treasury in the form of taxes. This would sufficiently capitalize this bank allowing the bank to be responsible for all problem banks, possible bank liquidations and the integrity of all deposit accounts. Because we would own and capitalize the bank we would take extreme care in that entire process. We would disclose this to all depositors and let them decide if they wanted to deposit and borrow from us or the remaining 12 mega banks. Sounds to simple but sometime keeping it simple is the best solution.

Thank you for an avenue to vent

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