

**From:** Paul Clabuesch [mailto:paul@thumbnational.com]  
**Sent:** Tuesday, March 03, 2009 3:26 PM  
**To:** Comments  
**Subject:** FDIC Insurance Premiums

Dear Ms. Bair,

I know that you are receiving many, many comments of interest from all sorts of places and perspectives regarding the recent announcement of a unprecedented increase in FDIC insurance premiums for all regulated financial institutions under your supervision. Please understand that I understand the difficult position that you and all of your colleagues at the FDIC have been placed under as a result of the current financial crisis. However, you must have realized the unbelievably difficult and frankly unfair position small community banks, such as mine, Thumb National Bank & Trust Co. of Pigeon, Michigan, have also been placed. There just has to be some kind of compromise position that can be arrived at, to properly restore the FDIC Fund to a more sufficient level of reserves. Regardless of the size of the financial institution (You might guess, I am not a big fan of the largest investment banks and unregulated mortgage brokers that primarily caused this problem) this burden will likely be the straw that proverbially breaks the camels back for any sized financial institution. Notwithstanding the FDIC's need for sufficient reserves, there is no possible way this unfortunate solution will help jump start the lending function at any bank nor restore the functionality of the financial system of the United States. that is so vitally needed to get our economy moving again. I do understand the need for the FDIC's ability to provide the underpinnings for safety and soundness and the need for depositors to feel that their money is safe. I am quite convinced that if the unregulated financial institutions and the parts of the regulated banks that are not under any proper regulatory scrutiny, had been properly supervised, we would not be in any where near the trouble we find ourselves today. Please don't destroy the best part of the financial system that will be the path out of this serious situation, the regulated commercial banks of the United States, big or small. ( But Especially Small.) We need a proper compromise.

Sincerely,

Paul Clabuesch  
Chairman & C.E.O.  
Thumb National Bank & Trust Co.  
Pigeon, Michigan 48755