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March 3, 2009

Federal Deposit Insurance Corporation

Re: Premium Increase and Special 20-Cent Assessment

Gentlemen:

FDIC's decision to raise second-quarter deposit-insurance premiums and impose a 20-basis-point special emergency assessment (and potentially additional future assessments) on community banks is simply an outrage!

We emphatically join with other community bankers in voicing our concern over this latest blow to main street banks. ICBA's President and CEO, Camden Fine, eloquently and accurately expressed the community banks' position in a statement that was recently released. Wall Street banks created the nation's financial problems, and it is only fair that they shoulder the burden of the FDIC special assessment.

Main Street banks have been "following the rules" to serve the needs of their communities and are continuing to do so, but this extra burden is crippling and will undoubtedly result in further deterioration of the banking industry. As policymakers, you must anticipate the probable results of this recent decision and reverse it by levying the special assessment on the "to-big-to-fail" banks.

Sincerely,

Lowell W. White
President/CEO