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# FIRST NATIONAL BANK OF THE NORTH

With Offices in Sandstone, Askov, Kerrick & Hinckley, Minnesota

October 13, 2009

Robert Feldman, Executive Secretary  
Attn: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street N.W.  
Washington, DC 20429

RE: RIN 3064-AD49

Dear Mr. Feldman:

We appreciate the opportunity to comment on the proposed rules to amend its assessment regulations to require insured institutions to prepay for 3 years on December 30, 2009 (RIN 3064-AD49).

However, we would hope that the FDIC would consider the assessments based on assets of the institution and not deposits as proposed. The proposed method penalizes small community banks, whose majority of assets is deposits, in comparison to large regional banks that pay much less when computed as a percent of their deposits.

We suspect that any small banking requesting an exclusion on the basis of liquidity or safety and soundness may be overlooked by the FDIC, since they will be preoccupied with analyzing that same claim by the large regional banks.

We would hope that you will consider these comments when proceeding to adopt these new rules.

Thank you,

William P. Loew  
President

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