

CBank

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Cincinnati, Ohio 45202
513-651-3000

October 5, 2009

Ms. Sheila Bair
Chairman
Federal Deposit Insurance Corporation
550 17th St, NW Room MB6028
Washington DC 20429

Subject: Proposed FDIC Insurance Premium Prepayment Plan

Dear Chairman Bair:

The purpose of this letter is to comment on the proposed FDIC insurance premium prepayment plan.

CBank Executive Management and the Board of Directors believe strongly that the prepayment assessment methodology should mirror the methodology used for the 2009 Special Assessment. Stated another way, the prepayment assessment should be calculated using Total Assets minus Tier 1 Capital. This method is a more equitable way to assess the insurance premium prepayments compared to the traditional deposit assessment calculation.

Sincerely,



James A. Fishell
Chief Executive Officer

cc: Sherrod Brown
Ohio State Senator
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Washington, DC 20510

George V. Voinovich
Ohio State Senator
524 Hart Senate Office Building
Washington, DC 20510

Steven Driehaus
Ohio Congressman
408 Cannon HOB
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