

**From:** Tom Tenwalde [mailto:tom@greatlakesbb.com]  
**Sent:** Wednesday, March 04, 2009 9:10 AM  
**To:** Comments  
**Cc:** Charlotte Martin; rlpalmer@cbao.com; Judi Sullivan  
**Subject:** Assessments, RIN 3064-AD35

As an employee at one of the country's bankers' banks, I know first hand that the adoption of the 20 cent special assessment will be injurious to our nation's community banks on at least three levels.

First, bankers' banks are intimately aware of the risk profile of our client banks. Our clients were not a part of the systemic, relentless, and catastrophic process of booking high risk mortgage loans over the last several years. Much anecdotal evidence points to large banks providing the fuel to a network of mortgage brokers to generate high risk first and second mortgages and then buying those loans from the brokers.

Second, our clients are not nearly as reliant on fee income as the large banks, especially those now deemed "systemically too important to fail." Community banks typically do not have the structure, such as investment banking arms, to facilitate the risky actions that have contributed to these problems. Now community bank's margin based income will be impacted disproportionately to those with the fee income streams that were tied directly to these past practices.

Finally, job creation has historically been rooted in small business and community banks have always been committed to that type of lending. This special assessment will reduce our bank's profits by as much as 50% this year and we hear similar comments from our clients. It appears that a dysfunctional by-product of the current crisis, and particularly this assessment, is to undermine the survival prospects of America's community banks. The FDIC has stated that large banks pay 70% of the FDIC premiums and account for only 40% of the losses. I wonder how many community banks can fail to equal one IndyMac. The beneficiaries of fewer community banks will be the same banks that contributed disproportionately to the current problems. The losers will be the communities and businesses that depend on community banks.

Finally, while a small factor, it is worth noting that bankers' banks generate their deposits from other banks. This effectively leads to a double assessment on those deposits.

I strongly favor an assessment based on the risk profile of the banks being assessed. The insurance industry clearly understands the aspect of risk based premiums, ask any driver who has turned 25 years of age and seen a reduction in their insurance premium. Let those banks that represent the most risk of loss have their premium assessment reflect the inherent risk in their balance sheet.

**Tom**

Thomas W. Tenwalde  
Vice Chairman  
Great Lakes Bankers Bank  
1182 Claycraft Road  
Gahanna, OH 43230