



March 17, 2009

VIA EMAIL: [comments@fdic.gov](mailto:comments@fdic.gov)

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

**RE: Deposit Insurance Assessments and Formulas**

Dear Chairman Bair:

To prevent weakening of community banks at this pivotal juncture, we respectfully request your reconsideration of the financial burden caused by the proposed higher deposit insurance premiums and special assessments. We urge you to ensure that community banks and those who serve them are not unduly burdened with "catch-up" premiums and overly aggressive plans to restore the deposit insurance fund. Furthermore, while we support the asset-based formula for assessing insurance premiums, we also request special dispensation for bankers' banks, due to their unique mission and balance sheet composition.

The asset-based formula method is especially damaging to TIB and other bankers' banks. For example, due to the Fed's liquidity facilities, volatile national fed funds market, and overall market turmoil, we have seen significant growth in our balance sheet. Over the past several months, community banks have moved an additional \$1 billion in overnight fed funds to TIB, as they increasingly seek safety and stability. This has resulted in TIB growing from less than \$2 billion in total assets to more than \$3 billion, while our total deposits have remained less than \$300 million. As you can see, moving to an asset-based formula would be punitive for TIB and other bankers' banks.

Please consider these important issues facing community banks, and our request for special dispensation in order to find a more equitable solution for bankers' banks. Bankers' banks have significant riskless overnight fed funds balances which reduces our overall risk profile when compared to a commercial bank of similar asset size. We believe community banks in partnership with their bankers' banks are leading and will continue to lead the banking economic recovery. Community bankers are able to actively focus on the business of banking, in part, due to the liquidity facilities, lending participations, operational services and other consistent support provided by their bankers' banks.

You may reach me at 972.650.6025 or [morourke@mybankersbank.com](mailto:morourke@mybankersbank.com) for any further clarification.

Best regards,

A handwritten signature in blue ink that reads "Michael O'Rourke".

Michael O'Rourke  
President and CEO