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STEVE A. BURNS

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March 9, 2009

Robert E. Feldman, Executive Secretary Attn.: Comments Federal Deposit Insurance Corporation 550 17th Street, N.W. Washington. D.C. 20429

Dear Mr. Feldman:

I am the President and CEO of Greenville National Bank, a \$310,000,000 community bank located in western Ohio. In spite of the current economic conditions, our bank continues to prosper because we haven't forgotten our responsibility to the community - - offering common sense loan products to customers who have a strong likelihood of repayment.

The FDIC's recent proposal to impose a 20 basis point assessment on domestic deposits will severely hamper our efforts to serve our community. In our case, the assessment would be approximately \$500,000, or 12% of our expected 2009 earnings and would be a 2% reduction in year-end capital. Also, the assessment will reduce our available funds for lending by a like amount. Community banks such as Greenville National are doing a good job of providing loans to worthy applicants in our community. It would be a severe detriment to our efforts in that area if this assessment is imposed.

I believe community banks are being penalized by this FDIC action. Please allow me to offer a few alternatives the FDIC should use instead of the 20 basis point assessment:



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- The assessment should be on a total asset basis (minus tangible capital). The systemic risk organizations fund their operations with a much smaller dependence on domestic deposits. By using a "total asset" basis, larger, riskier banks who have caused this financial turmoil would pay a larger proportionate share.
- Restrict the special assessment to only systemic risk organizations. In general, they are the banks who have utilized TARP funding. It would be fairer if these banks, who have access to taxpayer money, are called on to fix the problems they have created.

I hope the FDIC Board reconsiders their recent action to impose a 20 basis point assessment. There are much more palatable options the FDIC could and should use.

Respectfully,

Steve A. Burns

President

SAB:rnp