



October 20, 2009

Ms. Maureen E. Sweeney  
Deputy Director  
Federal Deposit Insurance Corporation  
550 Seventeenth Street, N.W.  
Room MB 4036  
Washington, D.C. 20429

RE: Notice of Proposed Rulemaking on Prepaid Assessments

Dear Ms. Sweeney:

I am writing to voice MB Financial's support for the FDIC's proposed plan to ask banks to prepay three years of insurance assessments. We support the proposal because it is the best alternative for maintaining the confidence of bank depositors. Here's why:

- The health of the Deposit Insurance Fund (DIF) is clearly vital to the health of the banking industry. The FDIC and the industry should make it absolutely and undoubtedly clear to the American public that the FDIC, through the DIF, is fully capable of honoring its commitment to America's insured bank depositors. Maintaining the FDIC's "brand image" of an agency that provides a "rock solid" guarantee is essential.
- Borrowing from the U.S. Treasury is not a good option. Doing so would make it appear that the DIF is incapable of insuring depositors without assistance from the U.S. Treasury. Such an appearance would shake the confidence of depositors, a dangerous result for the banking industry, the FDIC, and our economy.
- Borrowing from the U.S. Treasury is not a good option for another reason. It could subject the FDIC and the banking industry to additional and unwanted further oversight from Congress.
- Another special assessment, unless very large, would likely not provide the FDIC with resources sufficient to honor its deposit insurance commitment. Therefore, a series of special assessments would be more likely than not, making financial planning less certain for banks and bank stock investors.
- The proposed method used to compute the prepayment amount is fair. The quarterly "true-up" mechanism used for the actual assessment calculation is fair.



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In short, we believe that the proposed FDIC plan to replenish the DIF has struck the correct balance between assuring depositor confidence and burdening banks with added expense.

Sincerely,

A handwritten signature in black ink that reads 'Mitchell Feiger'. The signature is written in a cursive style with a large, looping 'M' and a long, sweeping tail on the 'g'.

Mitchell Feiger  
Chief Executive Officer and President