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Every dollar of this special assessment will be a direct hit to bank capital. It seems counter-intuitive that at a time in which the Treasury Department is seeking to inject additional forms of capital into banks, that FDIC would turn around and remove capital from the system. It would seem more logical to go directly to the Treasury Department to replenish the DIF, even accessing the actual TARP funds perhaps.

Community bankers like myself worry that this reduction in bank capital will result in a direct reduction in lending activity across the country.

I would ask that the FDIC seriously reconsider this special assessment and explore other possible alternatives for increasing the DIF.

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