

Sent: Monday, October 26, 2009 9:50 AM
To: Comments
Subject: Prepaid Assessments: RIN 3064-AD49

Robert Meyerson
Atwater, MN 56209-0755

October 26, 2009

Comments to FDIC

Dear Comments to FDIC:

I congratulate the FDIC on crafting an assessment which doesn't have the impact on the bottom line that a special assessment would. I have only one thing to add, and that is that the assessment should be based on total assets or total liabilities (excluding capital).

To be sure, the FDIC insures deposits, but that doesn't mean its assessments need to be on deposits only. The risk rate multiplier used to determine the assessment is not based on assets. No bank was ever closed because it had too many deposits, or because its deposits were too risky. Banks are closed because of devalued assets -- bad loans and bad investments. Banks acquire non-deposit liabilities in order to acquire assets. In fairness, they (the banks and the non-deposit liabilities) need to carry their weight.

Thank you for considering my opinion.

Sincerely,

Robert Meyerson