

From: Becky Donelson [mailto:beckydonelson@ymail.com]  
Sent: Sunday, March 15, 2009 12:04 PM  
To: Comments  
Subject: Opposition to RIN 3064-AD35: Proposed FDIC Special Assessment pursuant to 12 CFR Part 327

Becky Donelson  
Asst. Controller  
Eagle Bank & Trust Co  
2507 Springhill Village Dr  
Bryant, AR 72022-9260

March 15, 2009

Robert E. Feldman  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429

Dear Robert Feldman:

The special assessment is a significant and unexpected cost to my bank that will devastate earnings.

We are already dealing with a deepening recession, accounting rules that overstate economic losses and unfairly reduce capital, regulatory pressure to classify assets that continue to perform, and a significant increase in regular quarterly FDIC premiums.

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Banks like mine that never made a subprime loan and have served our communities in a responsible way for years and years are being unfairly penalized.

The special assessment is completely at odds with my bank's efforts to help my community rebuild from this economic downturn.

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The reduction in earnings will make it harder to build capital when it is needed the most.

We will also be forced to look at ways to lower the cost of other expenses, which may limit our ability to sponsor community activities or make charitable donations - something that we have done year after year.

The implications for this significant FDIC charge will impact every corner of my community. It is patently unfair and harmful to burden a healthy bank like mine that is best positioned to help the economy recover.

I urge you to consider more reasonable funding options, such as;

- Use the FDIC's borrowing authority with Treasury if the fund needs resources in the short-run. This is the purpose of this fund and it remains an obligation of the banking industry. Moreover, it allows any cost to be spread over a long period of time; and

Making these modifications will ensure that the fund remains secure and will allow my bank to continue to lend in our community. I urge you to take these suggestions into consideration when the Board meets in April to finalize the special assessment rule.

Sincerely,

Becky Donelson  
501-847-1733  
Asst. Controller  
Eagle Bank & Trust Co