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Sent: Friday, March 13, 2009 6:12 PM
To: Comments
Subject: RIN3064-AD35

Robert E. Feldman
Executive Secretary
Attention: Comments Federal Deposit Insurance Corporation
RE: RIN3064-AD35

I am very disappointed in what I am watching unfold. The Federal Bank Examiners and FDIC were relaxed in their job and allowed very inappropriate lending practices to occur creating this massive bank crisis. There is no doubt that the FDIC insurance fund is very important to all banks no matter the condition, but under the current circumstances it is not a good idea to lower the liquidity level of stronger banks to strengthen weak poorly managed banks. This will make it very difficult to encourage our normally very eager stockholders to invest more capital into our banks for fear our federal government is going to mandate a socialist idea of assessing our bank and **taking** their money to re-allocate to an irresponsible bank somewhere else. This can make it very difficult to raise future capital for investment in our local communities through charities, schools, and economic development & growth. The assessment will force banks in Oklahoma shrink causing our states economy to recess more than it already has. This assessment will cause the cost of operating any business in Oklahoma to increase due to increased interest rates and fees further suppressing our states economy along with shrinking loan volume and profits.

Oklahoma banks as a whole have used prudent lending practices per regulators guidelines and have built liquidity and strength to ensure longevity in all economic climates. It is absolutely unfair to assess all of the banks equally when Oklahoma banks have played by the rules. Banks should be assessed according to a risk rating to make the assessment more fair.

We definitely all agree about the need to replenish our FDIC Insurance fund, but we should not use this indirect tax on our banks, investors, and customers to do so. This is truly another form of a tax on top of what is already paid out. The TARP funds would be a good way to replenish the fund or a combination of TARP funds and increasing the line of credit to FDIC. A Temporary Liquidity Guarantee Program would also be a good choice and force the banks to learn to manage their assets better and force them to work their way out of their risky situation.

This is an opportunity to set a fiscally responsible example of good management and accountability. It is also an opportunity force these underperforming banks to work their way out of a dangerous situation without burdening and weakening the rest of the banking industry.

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