From: Larry Patton [mailto:LPatton@botw-ep.com]
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To: Comments
Subject: Special Assessment

Community banks should not be penalized for mismanagement by the Wall Street banks and investment banking firms. Yes, there are community and regional banks failing around the country which the regulators, for many years, allowed to grow too fast and make loans outside their trade areas, outstripping their liquidity, capital and management ability. If these banks and the projected bank failures are weakening the FDIC reserves, it is because the government has treated them differently than the big banks and has allowed them to fail.

These are extraordinary times and the Treasury should provide support for the community banks by funding the FDIC's reserve short fall.

We are a high performing bank operating only in El Paso and have managed the bank in a traditional manner, similar to many community banks across the nation. However, this assessment will represent 13% of last year and projected earnings. Banks that are average or below in their performance will see an assessment that will represent 50% of their earnings.

Now is not the time to weaken the capital position or liquidity of community banks. We want to be treated in an equitable manner. The TARP banks simply give some of the capital support bank to the FDIC and will turn around and ask for more TARP funds, while the community banks fund the assessment right off the bottom line, Sub S stockholders essentially write the check as if it were another government tax.

The FDIC cannot operate as "business as usual", surely you have to see the inequity in all this.

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