

From: Eva Martinez [mailto:emartinez@commnatlbank.com]
Sent: Friday, March 13, 2009 9:50 AM
To: Comments
Subject: FDIC Special Assessment

Eva Martinez
5006 Castlecreek Lane
Houston, TX 77053-3602

March 13, 2009

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

Dear Robert Feldman:

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 since our bank was founded.

The implications of 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.

Given the impact that the proposed assessment will have on my bank and community, I strongly urge you to consider alternatives that would reduce our burden and provide the FDIC the funding it needs in the short term.

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

- Reduce the special assessment and spread its cost over 10 years. The FDIC should spread out the recapitalization of the fund over a longer time frame as well.
- Use a convertible debt option, whereby the FDIC could convert debt borrowed from the banking industry into capital to offset losses if the funds are needed. This would allow me to write off the expense only when the funds are actually needed.
- 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.
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- Use the revenue that the FDIC is collecting from the Temporary Liquidity Guarantee Program. There is considerable revenue from those banks that are issuing guaranteed debt to help support the FDIC at this critical time.

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,

Eva Martinez
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