**From:** james armstrong [mailto:JArmstrong@metamorabank.com]

Sent: Tuesday, October 27, 2009 11:39 AM

To: Comments

**Subject:** Proposed Prepayment Assessment Plan

I have big concerns that the FDIC is going to calculate the prepayment assessment based on deposits and not Assets minus Tier 1 Capital. I realize this is to be considered for accounting purposes a prepaid asset but I still am required to use up cash that would otherwise be loaned out to local businesses in our community. Plus federal examiners are currently requiring community banks to put more and money into reserves during this downturn. We need to be able to make loans to small business that will put people to work. People working rather than special assessments will benefit our banks more in the long. run

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