

March 23, 2009

Sheila Bair, Chairman
Federal Deposit Insurance Corporation
3501 North Fairfax Drive
Arlington, VA 22226

RE: RIN # 3064-AD35

Dear Chairman Bair,

I am the President and Chief Executive Officer of CitizensBANK in Slaton, Texas and I am writing in response to the FDIC's proposal to impose an emergency special assessment equal to 20 basis points of insured institutions' assessment base on June 30, 2009, and possibly further special assessments if necessary. We certainly understand these are difficult times and that the deposit insurance fund is being depleted. However, a special assessment of this size would have a significant negative impact on all community banks earnings and capital, at a time that we have already seen numerous problem banks being added to your FDIC Problem Bank List.

Our \$220 million bank operates safely and soundly and unlike the too-big-to-fail institutions, we did not contribute to our nation's economic and financial crisis. We are well-capitalized and have money to lend to credit-worthy borrowers. At a critical time when our citizens and small business owners need access to credit, this special assessment will not only compromise our capital, but also reduces available credit. Furthermore, basing the assessment on total deposits clearly once again favors the too-big-to-fail institutions. There are clearly more options available.

First, I would like for the FDIC to consider reducing the special assessment and spread its cost over 10 years. Lowering the unexpected assessment to single digits appears reasonable and attainable based on most recent discussions. Of course, we all realize this would require special action by Congress to force FASB to allow such accounting. Secondly, the assessment should be based on total assets, both foreign and domestic, rather than on domestic deposits.

Thank you for your consideration of these comments.

Blake Boyd
President & CEO