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**To:** Comments

**Cc:** info@icba.org

**Subject:** FDIC Assessment

We are one of the small community banks that is getting hit extremely hard with FDIC Insurance Premium even though we were not one of the banks that had risky liberal lending practices that has caused most of our problems. We could support broadening the assessment base to include total assets which would shift more of the fair share to the banks who have caused our problems. We could also support a change in rules to allow us the opportunity to amortize the special assessment over a period of years.

Our FDIC premium for 2009 will be 350% more than in 2008 without the special assessment of either 20 or 10 basis points. With the increase in premium and with a 20 basis point assessment, our increase for 2009 over 2008 will be approximately 1,065%.

We have been a bank that has been very generous in helping our community but this will definitely put a halt to that which will further exacerbate the current economic downturn.

It appears that this assessment will further erode the capital of many smaller banks to the extent that they will also fail which will then put more pressure on the FDIC insurance funds again. We would encourage the FDIC to seek other alternatives in lieu of imposing a special assessment.

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