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To: Comments

Subject: Assessments, RIN 3064-AD35

I believe that whether the special assessment is 10 or 20 basis points, this assessment, when combined with our banks regular 2009 assessment, will be detrimental to our earnings and capital and will have an adverse effect on our ability to lend money and serve our community.

Community banks are being unfairly penalized for a problem in which they did not participate in the cause. I urge the FDIC to begin assessing all deposit insurance assessments on the basis of total consolidated tangible assets at the holding company level.

I urge the FDIC to implement a systemic risk premium for the large banks.

I also encourage you to utilize your ability to borrow from Treasury. This will allow banks to pay the cost of recapitalizing the DIF over time.

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