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VIA EMAIL: comments@fdic.gov

Robert E. Feldman, Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, DC 20429

RE: RIN3064-AD66

The Bankers' Bank Council (BBC) is fully committed to the safe and sound practice of banking, including regulations intended to effect the premise that an insured institution should pay commensurate deposit insurance premiums as the size and scope of business in which an insured institution engages bears upon the risk and probability of loss to the Deposit Insurance Fund.

We consider that FDIC's proposal of November 9, 2011, changing the assessment base to consolidated total assets less tangible equity capital, with its designated adjustments for bankers' banks, provides an effective framework to execute the intended premise.

The current FDIC proposal will allow bankers' banks to deduct from the generally-applicable assessment base the sum of their average daily (1) pass-through reserve balances at Federal Reserve Banks, (2) reserve balances held at Federal Reserve Banks for the bankers' banks' own account, and (3) federal funds sold (the aggregate of such deductions not to exceed the sum of total deposits of other US financial institutions and federal funds purchased for bankers' banks' own account). However, we would suggest that all Excess Reserve Balances maintained by bankers' banks for their own accounts at the Central Bank should be included in the deduction.

The reasoning behind this suggestion is that bankers' banks' excess reserve balances are, like the other three deduction-meriting classes, assets tied to the liquidity and funding services performed by bankers' banks for community banks. Given that all such offerings represent so much larger a segment of bankers' banks' total potential income opportunity than for other institutions, we believe this additional deduction from the generally-applicable assessment base is likewise appropriate under The Dodd-Frank Act.

We acknowledge the enhanced sensitivity with which FDIC has addressed this issue vis-à-vis our unique service to community banks. We appreciate the FDIC's outreach efforts to the bankers' banks.

Thank you for your consideration.

Sincerely,

Don Abernathy, Jr.

Don Abernathy, Jr., Chairman
The Bankers Bank Council