November 24, 2010

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments, Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: RIN 3064-AD63 - Assessments, Dividends and DRR NPRM

Dear Mr. Feldman:

Please accept these comments on behalf of the OBA's 250 member banks and thrifts in regard to the above-referenced proposal. We join in the comments provided by the American Bankers Association that have been or that will shortly be filed, but would emphasize the following key points:

1. **<u>THERE SHOULD BE EQUALITY IN THE MANNER THAT CREDIT UNION AND BANK INSURANCE FUNDS ARE TREATED AND FUNDED</u>**. There should be no different treatment between that given to the National Credit Union Share Insurance Fund (NCUSIF) the size of which has a limit of 1.50 percent of insured credit union deposits and that given to the Deposit Insurance Fund (DIF) managed by the FDIC. The target size for the DIF should be no greater than the NCUSIF, for obvious competitive and equitable reasons. The funds provide the same "full faith and credit" guarantee and cover the same consumer 'deposits' (regardless of the "share" label given to deposits by credit unions). To do otherwise will penalize banks and gives credit unions yet another advantage in today's marketplace. And that's without taking into consideration the problems the NCUSIF is facing because of credit union failures.

   It's time to stop pretending the vast majority of credit unions are something other than what they are: fully-insured depository institutions, each of which is open to the general public. To continue the charade of pretending these entities are something other than that is nonsense and should not be memorialized by providing for different treatment of the industries two separate insurance funds.

2. **<u>THERE SHOULD BE A CAP PLACED ON THE DIF.</u>** The NCUSIF cap is statutory and, accordingly, the FDIC should impose a similar cap of 1.50 percent

of all insured deposits. If there is no cap, in addition to the competitive equity issue noted above, it will simply be too much temptation for Congress to avoid using it for other purposes than for protecting depositors. At the end of the day, that's the purpose of the DIF, and nothing more. The money in the Fund comes from banks and the interest that's earned on those assessments.

3. **PREMIUMS SHOULD BE PREDICTABLE AND CONSISTENT OVER TIME**. The uncertainty that assaults the industry today comes from a number of various sources, but the combined impact is clear. Uncertainties about taxes, future costs, additional regulatory requirements and exponentially increased compliance costs have caused many bankers to simply "hunker down" and wait to see what comes next from Washington. In addition, everyone knows that bank examiners are looking more closely at every detail of every bank's operation, especially the manner in which it has extended credit. The more consistent and steady the premiums can be, the better bankers are able to plan and continue their work in their local communities.

Thank you for the opportunity to provide these comments for your consideration. On behalf of our member banks, we all wish you a Happy Thanksgiving and a most joyous holiday season.

Sincerely,

President & CEO
Oklahoma Bankers Association

Roger M. Beverage
President & CEO

Oklahoma Bankers Association
643 NE 41st Street
Oklahoma City, OK 73105
405-424-5252 (office)
405-850-0695 (cell)
We Make Bankers Better!