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To: Comments

Subject: ANPR - Incorporating Employee Compensation Criteria Into The Risk Assessment System

No RIN number provided.

This proposed rule on Incorporating Employee Compensation into the Risk Assessment System further emphasizes the vast difference between the Wall Street banks and community "main-street" banks. We hear in the news of individual bonuses that far exceed total annual salary expense for our entire organization. Applying the same formula to these two extremely different types of "bank" makes no sense.

I was dismayed to read that 8 of the 10 largest banks (as identified in last year's "Stress Test") opted out of the TLGP that provides unlimited guarantees on non-interest bearing deposits. These are the "too big to fail" banks. They were allowed to opt out and avoid the increased premium on coverage they will automatically receive because the consequences of allowing them to fail are unacceptable.

We, "main-street" banks, are experiencing some devastating blows in deposit insurance costs and over-zealous rule/regulation making for actions we have not been a part of. The system is broken. It will need many band aids, like this proposal, or a complete overhaul to fix it. And when it is all done, many "main-street" banks will be gone with many of their deposited dollars transferred to financial giants who will employ exotic strategies to generate big revenues that will return to them in the form of another incomprehensible bonus payment.

Respectfully,

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