

**The Honorable Sheila C. Bair
The Federal Deposit Insurance Corporation
1776 F Street, NW,
Washington, DC 20006**

Dear Chairman Bair,

I write to express my support for the FDIC's action on April 13, 2010, extending the Transaction Account Guarantee (TAG) Program component of the Temporary Liquidity Guarantee Program (TLGP) to provide full coverage of participating institutions' non-interest bearing transaction accounts, certain negotiable accounts and attorney trust accounts until December 31, 2010.

The TAG program has provided additional security to my community bank's customers by eliminating potential risks associated with their day-to-day transaction accounts. As a result, the TAG program allows these businesses to continue their activities, and also has helped my bank to maintain a more stable deposit base. These deposits are critical to SpiritBank's ability to lend and promote growth in the Oklahoma communities we serve in this still difficult economic environment. The extension of the TAG program is a positive move to allow our bank to provide critical and needed loans for the economic growth of our communities.

Our bank, SpiritBank, Tulsa, Oklahoma, has utilized this service to provide safety, liquidity, and returns to many customers, which includes many public sector entities.

Most public entities are struggling with their budgets due to diminished tax revenues and declining asset values. They are faced with laying off infrastructure positions (police, teachers, firemen, etc) or implementing furloughs. The safety and security of the communities we serve is being threatened. We have used the special NOW account provision of the Temporary Liquidity Guarantee Program with it's ceiling rate of fifty (50) basis points to provide an enhanced revenue source for many counties, cities, towns and schools when compared with the rates being paid by the Too Big To Fail trust department competitors. In addition, these entities are pleased to bring deposits back into their local communities to be used by a local community bank like SpiritBank in extending loans to finance job creating businesses like hospitals, grocery stores, and aerospace companies in the communities we serve.

While we are pleased that the TLGP program is being extended, we are very disappointed in the proposed rate cap of twenty five (25) basis points on the special NOW account in the definition of non-interest bearing accounts. The decrease in the covered rate will cause our bank to make some difficult decisions. We may lose funds back to the Too Big To Fail trust department competitors, or we may have to pledge securities as collateral for these deposits. In the event of the later, we will be pledging assets that could have been used to make loans, thus diminishing the opportunity to support growth in our communities at a time when making and funding loans would benefit our communities.

For the sake of our Public Sector clients, it is our hope that the FDIC will consider maintaining the current rate of fifty (50) basis points or at a minimum grandfather our existing accounts that are on our books on June 30, 2010.

Reductions in earnings for these public entities would force many to increase reductions in staff, or reductions in services, or increase tax rates to make up for lost revenues. That's why they may be forced to leave our community bank for the Too Big To Fail trust department's higher returns, rather than accept the 0.25% rate in order to have the unlimited FDIC insurance coverage while our economy continues to heal.

Thank you for considering changing this portion of your proposed regulation.

Once again, the FDIC appropriately acted to create the program in 2008 in response to significant systematic liquidity concerns. Although we are seeing signs of an increasing stability in our banking system, I believe that current conditions warrant this further extension of the TAG program and commend the FDIC for this extension.

**Most Sincerely,
Kelley Sanders
Senior Deposits Officer
SpiritBank**