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To: Comments
Subject: RIN# (employee compensation programs)

Basing FDIC premiums on compensation packages is crossing the line of government takeover of private business. And to say that the FDIC is not seeking to limit the amount of employee compensation is nothing less than disingenuous. It is indeed exactly that, only doing it through the back door! The existing risk-based assessment system is already designed as an incentive for banks to manage all risk - including employee compensation. But there has not been sufficient time to see the results of this pricing formula.

Our current government mentality of "never let a serious crisis go to waste" is creating an enormous increase in new and changed regulations. But banks - and particularly small, community banks like ours - cannot weather much more. We are constantly being penalized for the wrongdoings of others. And, while we certainly don't have any compensation packages that would cause risk to our bank, we will still be forced to create one more policy and another set of procedures for regulators to criticize us on.

Writing blanket regulations for businesses, that result in affecting only a small handful of those businesses, is completely counterproductive - and this is just another example of such. I would suggest this proposal becomes a set of "guidelines" to be followed, but not another mandated regulation. And give the existing risk-based assessment system a chance to fully kick in.