



January 3, 2011

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

Re: RIN 3064-AD66; Assessments, Assessment Base and Rates

Dear Mr. Feldman:

On behalf of the nearly 600 commercial banks and thrifts that are members of the Texas Bankers Association (TBA), thank you for the opportunity to comment on the Federal Deposit Insurance Corporation's (FDIC) proposal regarding the assessment base and rate schedule.

We appreciate the work the FDIC has done in fulfilling the Dodd-Frank Act's mandate that the Agency's assessment base be redefined. However, we are concerned that the Agency may have exceeded its own intent as it relates to the revenue generated by the proposal.

The FDIC states in the proposal's overview that its purpose in changing the base rate schedule is to collect approximately the same amount of revenue under the new base as under the old base. Yet, if implemented, this proposal will dramatically change the incidence of assessments among banks. This could result in reaching the reserve ratio established by the FDIC at a faster pace than mandated by the Dodd-Frank Act, which means the FDIC would collect *more* revenue under the new base than under the old base. TBA understands that developing a rate that would be revenue neutral is difficult, but our members would rather see the FDIC fulfill its stated purpose when publishing this rule and develop an assessment rate that would be such that the industry would pay no more in total than under the old base.

Thank you in advance for your time and your careful consideration of the above.

Sincerely,

Celeste May
Assistant General Counsel