From: Jon Lorenz [mailto:jonl@cobizfinancial.com]
Sent: Thursday, October 14, 2010 1:07 PM
To: Comments
Subject: Proposed Rules published in the Federal Register on September 30, 2010 RIN # 3064 AD 37

This letter is in response to the Proposed Rules published in the Federal Register on September 30, 2010 RIN # 3064 AD 37. The proposed rule affects the coverage by the FDIC under the Transaction Accounts Guarantee Program (TAGP). It is our understanding that the proposed rule would extend the TAGP for non-interest bearing accounts to provide FDIC insurance on such accounts without the limitations of $250,000 per individual account. The proposed rule would, however, end the unlimited coverage of low-interest negotiable order of withdrawal ("NOW") accounts for individuals, non-profit organizations and governmental entities and for accounts paying limited interest on lawyers' trust ("IOLTA") accounts. The current program, permitting qualified depositors to receive interest of no more than .25% per annum, is set to expire on December 31, 2010.

We are pleased that the extension of FDIC insurance for non-interest bearing accounts is being included in the provisions of the Dodd-Frank Act. For smaller banks such as Colorado Business Bank, the ability to provide such insurance to our commercial clients is vital in preventing depositors from seeking to disburse their banking relationship to multiple banks to assure that they will be insured. The more likely scenario, however, is that those accounts will be moved to a single account in a bank deemed "too big to fail." Extending the FDIC program through the Dodd-Frank Act will help significantly to prevent this flight of deposits from banks such as ours.

The same effect we feared from non-interest-bearing deposits is likely to take place when the low-interest accounts are no longer eligible for FDIC insurance. We expect that much of the $76 million held by our bank in these low-interest bearing deposits will be moved to large money-center banks without the benefit of insurance. These deposits represent core customers of our bank and include many local non-profit organizations who are extremely cautious today about the safety of their deposits. As a result, the money we would otherwise be able to lend within our communities will be diminished and many long term customers of our bank will be lost. Extension of coverage for low-interest NOW accounts until December 31, 2012 would provide time for both the economy and the banking industry to stabilize and confidence in the banking industry to be restored.

As the economy slowly begins to recover from the banking crises of 2008, failure to include the low-interest account in the proposed rules for the Dodd-Frank Act will serve to slow the recovery and create additional stress on the regional banking industry.

Sincerely,

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