



February 17, 2010

Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, D.C. 20429-9990

Re: RIN 3064-AD56

Dear Mr. Feldman:

I appreciate the opportunity to provide comments to the Federal Deposit Insurance Corporation (FDIC) regarding the proposed rulemaking on whether to incorporate employee compensation criteria into the risk assessment system as issued January 12, 2010. This is obviously a complex issue, and a general recommendation to proceed with caution is in order. My specific comments are as follows:

Item 1

I am especially concerned regarding the proposed requirement that “a significant portion of compensation...would be comprised of restricted, non-discounted company stock.” As a private firm, we would not be able to meet such a requirement. I would advocate that more flexibility is needed in such a rule, considering that this option might simply not be available to some firms. The inclusive of some alternative means to meet the requirement would be appropriate.

Item 5

In response to the question regarding whether “the effort to price the risk posed to the DIF by certain compensation plans be directed only to larger institutions,” I answer—YES. The issues around excessive incentive payments relate primarily to large investment banks. The media stories we all hear about excessive payouts are made at these behemoths, and this is certainly not the norm in our part of the world. Don’t punish safe and sound banks like ours that historically have done and continue to do the right things for the right reasons.

Item 12

I certainly understand the need for managing risks. However, banks should be permitted a reasonable amount of flexibility to craft compensation programs that meet their specific needs. Indeed, one size does not fit all. Banks must ultimately be competitive in the marketplace to recruit and retain quality talent.

Thanks for your consideration of my comments. Contact me with any questions at 803-931-8672.

Sincerely,

Alvin Shaver, SPHR
Senior Vice President
Director of Compensation and Benefits