



Member Johnson Financial Group

April 12, 2011

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
555 17th Street, N.W.
Washington, DC 20429

Re: Amendments to Deposit Insurance Regulations, 12 CFR Part 330-Deposit Insurance Education; RIN #3064-AD37

Dear Mr. Feldman:

Johnson Financial Group, Inc. ("JFG") is a \$5.0-billion financial holding company headquartered in Racine, Wisconsin, operating through several affiliated companies primarily in the states of Wisconsin and Arizona. Our product/service lines include banking, trust, and investment services (Johnson Bank), an insurance agency (Johnson Insurance Services, LLC), and branded brokerage and credit card services (with joint marketing partners).

We would like to take the opportunity to offer comment on the proposed rulemaking to improve consumer awareness of deposit insurance coverage.

Johnson Bank believes in continuing education to help the consumer understand and determine how their deposits are fully insured and protected by the Federal Deposit Insurance Corporation (FDIC). We believe maintaining consumer confidence in the FDIC as well as Banks is vitally important to the financial industry.

In our current environment, to focus the attention of every customer opening a new account on the issue of the safety of their aggregate deposits and their protection against bank failure could create doubt not only about the adequacy of coverage, but the financial soundness of our bank. The costs of this proposal to the many who are otherwise unaffected by the issue far outweigh the remote and speculative benefits to a few. Moreover, the FDIC has failed to establish a record demonstrating that there is a threat to system confidence that warrants the obligations imposed by the proposal. In fact, FDIC's protection of depositors during the recent deep and prolonged recession has been nothing short of remarkable. We also believe that the proposed requirements

JOHNSON BANK

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would impose burdensome new compliance obligations that will complicate an otherwise simple public message of assurance and wear down public confidence in the safety of their deposits.

Currently, bank employees are wisely cautioned by the FDIC against advising depositors on the particular insurance coverage of a depositor's aggregate holdings. Instead, bank staff is generally instructed to direct customers with deposit insurance questions to the FDIC's extensive deposit insurance resources – its deposit insurance FAQs, guides, videos, EDIE, and the FDIC's toll free number. We believe this practice sufficiently satisfies the needs of our depositors and we have no antidotal evidence to believe otherwise.

We feel adoption of this rule would be duplication to the existing efforts of the FDIC while imposing another technical compliance burden on banks already addressing this concern.

Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

John R. Topczewski, SVP & Chief Compliance Officer, Johnson Bank

cc: Russell C. Weyers, President and Chief Operating Officer, Johnson Bank
Rose Oswald Poels, Sr. Vice President and Interim CEO, Wisconsin Bankers
Association