Maple Bank
11660 Theatre Drive North
Champlin, MN 55316

9-15-06

Re: FDIC; 12 CFR Part 327, RIN 3064-AD09 (proposal to assess banks less than seven years old a higher deposit insurance premium)

Dear Sir or Madam

I am unfamiliar with the data used to support a higher premium assessment on the basis of being a "new bank". However acknowledging some degree of higher risk to the insurance fund *may* be present during a bank's formative years would appear accordingly offset by large initial capital and frequent monitoring requisites. Minnesota start ups require a great deal of initial capital, close supervision in the form of annual examinations and audits and, staffing with proper backgrounds.

In consideration of these requirements I am unconvinced that banks less than 7 years old as a group represent greater risk to the insurance fund than another defined age group. A generalization using "new" as the basis for charging a higher deposit insurance premium requires a leap of faith that appears specious without justification.

Maple Bank is in the category cited for a higher premium, however, consider that Maple Bank was profitable at year two, has had three regulatory examinations, three audits, two outside loan reviews, ongoing internal audit procedures and has a former regulator on staff. While some banks, irrespective of size, may pose a heightened degree of risk to the insurance fund, my opinion would be that Maple Bank isn't one of them. And to group our bank (and others like it) into a higher risk category because it is less than 7 years old does not seem a reasonable risk assessment.

"New" shouldn't trigger a higher 'premium event', quantifiable risk should.

Cordially,

David Nightingale
Credit Manager