From: Neal Conover [mailto:NConover@northwestfederal.com]
Sent: Monday, September 18, 2006 12:42 PM
To: Comments
Cc: Floyd Stoner
Subject: RIN 3064-AD09 Assessments

Regarding the proposal to charge de novo charter banks a higher deposit premium, we believe that the total risk profile of the holding company or parent should be considered. Our holding company owns 4 bank charters and a thrift charter. In the past we have initiated new banking locations as either an office of a bank or thrift or as a new charter. The choice has been based on the competitive nature of the market we are entering. In either case our holding company provides the management and capital to support the effort. Should we choose a de novo bank charter for our next service extension, it should not result in any greater risk to the fund than a banking office. In fact, our de novo would be an established institution.

I request FDIC look at the composition of the ownership. Institutions who charter de novo banks <u>and</u> are a regulated bank or bank holding company should be exempt from the proposed higher premiums.