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September 15, 2006

Mr. Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 Seventeenth Street, N.W.
Washington, D.C. 20429

Attention: Comments

Re: Deposit Insurance Assessments and Federal Home Loan Bank Advances,
Federal Deposit Insurance Corporation (FDIC), RIN 3064-AD09

Dear Mr. Feldman:

United Western Bank appreciates the opportunity to comment on the FDIC's notice of proposed rulemaking and request for comment regarding deposit insurance assessments. There are two areas that we wish to comment for your consideration:

1. We believe the definition of regressors related to loans past due 30-90 days to gross assets percentage and nonperforming loans to gross assets should both exclude loans that are guaranteed as to principal by the United States Government or an agency thereof.
2. We believe Federal Home Loan Bank (FHLBank) advances should not be included in the definition of volatile liabilities and further we do not believe higher assessment rates should be charged to institutions that have significant amounts of secured liabilities.

As a federally chartered thrift one of our goals is to provide affordable housing to borrowers throughout the country. We own a significant portion of single family residential loans that are guaranteed as to principal by FHA and VA. In addition, we originate and own a significant portion of loans under the SBA 7a program. We believe it would be inappropriate to penalize institutions that provide this needed financing to home owners and small business owners. Also, from our own experience, the risk of loss on such assets is significantly less than the risk of loss on unguaranteed past due and non performing loans. As such information is readily available from the Thrift Financial Report we file quarterly, it would be relatively easy to eliminate guaranteed balances from the past due and non performing totals.

FHLBank advances are not volatile liabilities for FHLBank members. Advances offer pre-defined, understood, and predictable terms. In addition, the FHLBank provides reasonably priced opportunities to prudently leverage our mortgage backed securities and single family residential loans. FHLBank advances have proven to be as stable a source of funding as any of our customer deposits.

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As established by Congress, the primary purpose of the FHLBank System is to provide a source of long-term liquidity for FHLBank members. We have found advances from FHLBank Topeka to have a beneficial effect on our business plan. It would be illogical to include FHLBank advances in the definition of volatile liabilities given the stability of the FHLBanks, the reliable availability of advances as a source of wholesale funding, and the beneficial and predictable effect of such funding on members' business plans. Therefore, we urge the FDIC not to include FHLBank advances in the definition of volatile liabilities.

Thank you for your consideration of our views, if you have any questions please call me at 720-956-6503.

Sincerely,

UNITED WESTERN BANK

A handwritten signature in black ink, appearing to read "Benjamin C. Hirsh", written in a cursive style.

Benjamin C. Hirsh
Chief Accounting Officer

BCH/fs