

September 21, 2006

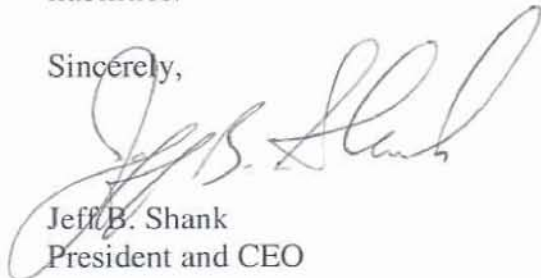
Mr. Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 Seventeenth Street, N.W.
Washington, D.C. 20429
VIA EMAIL: COMMENTS@FDIC.GOV

Re: Deposit Insurance Assessments and Federal Home Loan Bank
Advances/RIN#(3064-AD09)

Dear Mr. Feldman:

The cooperative relationship between the FHLBanks and member financial institutions has worked remarkably well for 75 years. FHLBank advances serve as a critical source of credit for housing and community development purposes, support sound financial management practices, and allow member banks throughout the nation to remain competitive. FHLBank membership has long been viewed as protection for deposit insurance funds because FHLBank members have access to guaranteed liquidity. Penalizing financial institutions for their cooperative relationship with the FHLBanks would result in their being less competitive, limit credit availability in the communities they serve, and limit their use of a valuable liquidity source, all for no justifiable economic or public policy reason. Again, The First National Bank of Greencastle urges the FDIC not to include Federal Home Loan Bank advances in the definition of volatile liabilities.

Sincerely,



Jeff B. Shank
President and CEO

JBS/dg

