From: Lynn Vaughn [mailto:lvaughn@bocok.com]
Sent: Tuesday, September 12, 2006 10:22 AM
To: Comments
Cc: Ken C. Fergeson; jchessen@aba.com
Subject: RIN 3064-AD09 Assessments

Sirs,

The changes that are being recommended by the FDIC are not fair and equitable.

Grouping all *de novo* banks together and imposing a blanket higher premium because they are *de novo* does not appear to be in the best interest of the industry as a whole. As a recently chartered financial institution, it would be my opinion that the chartering process, together with the increased supervision and capital requirements lessen, not increase the risk of failure.

Granted, there are those institutions that merit the increase, both *de novo* and established, but to impose a blanket higher premium just because a bank is considered *de novo* is no more the answer, than imposing a higher premium because a bank is located in the mid-western section of the United States instead of the north east.

I encourage you to reconsider the position, and to evaluate ALL banks based on individual capital, asset quality, management, earnings, and liquidity ----------- not on whether they have been in business for seven years or more.

Lynn Vaughn

President/COO
Bank of Commerce
Duncan, Oklahoma
580-252-8092
lvaughn@bocok.com