March 11, 2009

Robert E Feldman
Federal Deposit Insurance Corporation
550 17th St NW
Washington, DC 20429

Re: Assessments, RIN 3064-AD35

Dear Mr. Feldman,

The proposed special assessment is a crippling blow for small community banks that have been the very backbone of the financial industry. We have always endeavored to be conservative in our investment and lending policies and should not be forced to shoulder the burden for those institutions that had little regard for safe, sound banking practices.

Our bank is safe, sound and well-capitalized. Since 1964 we have well-served our community with reasonably priced services and we will continue to do so. We have not accepted any governmental handouts nor do we need or want TARP funds. We did not participate in sub-prime lending and we did not engage in investments with unnecessary risks for the sake of speculative profits. We did not contribute to, nor should we be forced to pay for the poor management and decisions made by the "too big to fail" banks that caused this predicament.

This assessment will be a hardship for banks that did not contribute to the extreme difficulties the banking industry is facing. The one time assessment of 20 basis points will impact our $63M bank in excess of $100,000 – quite a blow to any business when an item such as this was unbudgeted and unexpected! If the FDIC statutes restrict discriminating against an institution because of size, then perhaps the statutes need revision. Community banks should not be forced to pay for the situation created by the big Wall Street investment banks. Perhaps the banks that received the bailout money should be charged and made to pay the assessment from government funds they received.

FDIC should utilize the line of credit available through the Treasury to strengthen the deposit insurance fund and allow the safe and sound community banks to continue on the course they are currently pursuing. If the banks are forced to pay this overwhelming cost, an extended payment time should be given to banks that did not receive bailout money which could offset the expense. The FDIC should also restructure ratio criteria to insure that a devastating blow to earnings solely as a result of this expense will not be compounded with a lowered rating. Management and earnings ratings should in no way be adversely impacted as a result of a decision of this magnitude made by the FDIC. Overburdening the community banks with this assessment should be carefully reevaluated to estimate the consequences this burden will impose in helping the economy recover.

Sincerely,