From: Wheeless, Tanya [mailto:twheeless@AZBANKERS.ORG]
Sent: Monday, April 13, 2009 5:48 PM
Subject: Additional LLP Comment

I submitted a formal comment letter via web on Friday April 10, but had one additional thought. It is our hope that the LLP will be open to all banks, however, we are concerned that as with CPP, pools will start at the top (larger banks) and dwindle down (to small community banks) over a series of months. I would respectfully suggest that priority be given to banks that have NOT already received CPP funds. Perhaps this could be achieved by only processing requests from non-CPP banks (those that did not receive funds for whatever reason, including those that never applied for it in the first place) during the first 60 or 90 days of the program and then opening up the program and processing requests from all banks after that.

This would send a powerful public message that the FDIC is concerned with reaching all banks – not just the very large. And, it would provide some relief in geographic areas, such as Arizona, where CPP has made little to no impact.