
From: Joe Vich [mailto:josef.vich@cnb1.com]
Sent: Tuesday, March 31, 2009 4:24 PM
To: LLPComments
Subject: Legacy Loans Program Comments

The following are comments concerning the long awaited Legacy Loan Program. This program has the potential to finally reach smaller community banks and help them improve their balance sheets and free up capital for lending.

The market niche for most community banks has been commercial real estate and C & I lending for small business. This sector has been dramatically affected in the last few quarters. Historically small business has lead our country out of a recession, as a result we strongly urge the FDIC to include CRE and C & I loans in the program.

Many community banks have also relied on loan participations to enhance their earnings. Many of those loans were residential or commercial developments in larger metro areas. In most cases these developments have slowed and values decreased. These larger shared credits, whether classified as "Shared National Credits" or not, should be included in the program.

Finally, some consideration should be given to smaller banks by allowing multiple banks to pool assets for sale. Depending on the minimum size of the pools that is established, it may be difficult for smaller banks to participate.

Thanks you for soliciting comments on this program. We appreciate the opportunity to provide our views as community banks in the Midwest.

Sincerely,

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