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**GEORGIA BANKERS ASSOCIATION**  
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April 9, 2009

Sent by e-mail

Mr. Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17th Street, NW.  
Washington, DC 20429

Re: Legacy Loans Program

Dear Mr. Feldman:

On behalf of more than 350 commercial banks and thrifts in Georgia, I write regarding the FDIC's request for comments on the proposed Legacy Loans Program (LLP). In our view, this could be an important tool for removing troubled loans that are preventing some of our member banks from supporting new lending in communities throughout Georgia

In the FDIC's request for comment, you list a number of questions for consideration. Below are our thoughts about certain aspects of the proposed LLP that our members have provided.

- **Question 1:** With regard to which asset categories should be eligible for sale through the LLP, we want to strongly encourage the FDIC to include all types of assets and especially acquisition, construction and development loans that have impaired many banks' balance sheets and curtailed further lending in their communities.
- **Question 3:** For an appropriate percentage of government equity participation that will maximize returns for taxpayers while assuring integrity in the pricing by private investors, we favor a 50/50 split.
- **Question 5:** The FDIC can best encourage a broad and diverse range of investment participation by not overvaluing assets and not allowing retroactive changes to the LLP.
- **Question 7:** In considering what priorities the FDIC should consider in deciding which types of asset pools to set for the initial PPIF auctions, we would again encourage acquisition, construction and development loans as well as commercial real estate loans.
- **Question 11:** The FDIC fee for guaranteeing the debt of the PPIF should be a flat fee, which will be most efficient for bidders to underwrite.

We are grateful for the opportunity to comment on this program and look forward to helping the LLP be successful and beneficial for taxpayers, our communities, the federal government and the banking industry.

Sincerely,



Joe Brannen  
President and CEO