

**From:** Linda L. Exstrom [mailto:lexstrom@nbcok.com]  
**Sent:** Monday, September 11, 2006 6:37 PM  
**To:** Comments  
**Cc:** jchessen@aba.com; Joe D. Morris  
**Subject:** RIN 3064-AD09 Assessments

TO: FDIC

9-11-06

RE: *De Novo Banks* Higher Premiums

I would like to comment on FDIC's proposal for *de novo banks* paying an extra high premium. It seems to me that if you take our bank as an example, you will find that we have enhanced FDIC's positions instead of putting it at risk. The proposal for *de novo banks* to pay, up through the 7<sup>th</sup> year, a 2 basis points higher premium than similarly rated, older banks, does not exactly make sense in our case.

Our bank is 4 years old and was a purchase of a branch from another bank. We raised approximately \$6.3 million of new capital to help underwrite the same amount of deposits that were previously underwritten by the original bank. In that case, our bank provided FDIC with an additional \$6.3 million capital before any of its insurance was at risk.

Our bank has always been and continues to be a highly rated bank. We think it is well managed, has no risk of failure, and has put FDIC in less risk than it would have been if we were not in the trade area.

Our bank has not had any of the things you point out as reasons for higher risk. I mentioned that we are not in danger of failing; we do not have volatile or financial ratios; and we do not have an unseasoned loan portfolio as we purchased the loan portfolio with the branch. It would make more sense to me if FDIC would evaluate *de novo banks* on an individual basis just as it does with other banks.

I realize that if you want to make general assumptions and you do not have the manpower, then you can take the easy way out and make generalized assumptions. But it seems to me that our bank has been examined more often than other banks of similar ratings so you do have people in the field who know our bank and know it intimately.

Therefore I would suggest that *de novo banks* be evaluated as other banks, based on their individual capital ratings and capacity.

Sincerely,

Ken Fergeson , Director  
Bank of Commerce  
Duncan, Oklahoma

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