
From: Susan Tacchino [mailto:stacchino@countrybnk.com]
Sent: Thursday, March 05, 2009 10:28 AM
To: Comments
Subject: Assessments - Interim Rule - RIN 3064-AD35

From: Joseph M. Murphy
Country Bank
New York, NY

Date: March 4, 2009

Ref: Purposed FDIC Assessment and Insurance Fee Increase

We believe that it is patently unfair for the FDIC to assess all banks in the U.S. a 20 basis point fee and an increase in the quarterly insurance assessment.

With the 180 billion dollars of tax payers money used to keep AIG afloat and hundreds of billions given to the large banks and the auto companies it is unfair to assess the 'good' banks this outrageous fee.

We believe that the Federal Reserve System and the Treasury should contribute to the FDIC whatever billions are necessary to make whole any 'bad' banks on the FDIC watchlist for the foreseeable future. The proposed 20 basis point fee and proposed increased insurance assessments could do irreparable harm to the earning capability of the 'good' banks and put them at risk of failure in this period of increased asset defaults and writedowns.

In addition, the fee and assessments are calculated on total deposits even though in the event of a bank failure the FDIC insurance will only cover insured deposits. We believe that whatever fee and insurance assessment occurs should be assessed on no more than \$100,000 per account (\$250,000 for the moment).

Sincerely,

Joseph M. Murphy
Chairman