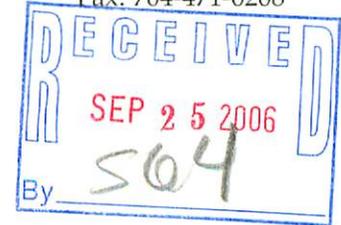




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September 19, 2006

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th St. N. W.
Washington, DC 29429

Re: RIN 3064-AD09, Proposal to Amend Regulations for Risk-Based Premiums

Dear Sir:

I am writing on behalf of de novo banks that are in their first seven years of operation. The proposal is to assess higher premiums just because they are new and not assess on their own merits of financial soundness. I am against this provision and encourage you to reconsider such a provision.

This places an unfair burden on de novo banks with respect to cost and perception in the market place. If depositors see the FDIC feels there is a greater risk for these institutions they may very well not bank with them which of course can and will be detrimental to these financial institutions. Also, additional cost added to the already high of a start up, is detrimental to achieving a stronger bank in less time.

My bank, Alliance Bank and Trust was chartered in September 2004. We have exceeded our expectations and our budget in our first two years of operations. We have gained back all the capital expended during start up and are now adding to the strength of our capital base.

We have had extensive examinations by the FDIC and the North Carolina Banking Commission and performed well. We see these exams as assistance and guidance in our policies and procedures. This has enabled us to achieve profitability much sooner than expected. As a result our capital base continues to grow and we remain solid.

To single out all de novo banks in such a manner, creates unfairness. Bank examiners can spot problems quickly and make banks take corrective action. As you know over 900 banks have been chartered in the past seven years and not one has failed due to the excellent supervision by the regulators.

This provision may hinder new start ups. Competition in the banking industry is good. Community banks provide something many large banks do not and that is service and being able to get a decision in a timely manner. Their deposits are loaned out in the communities from where they are generated thus helping to foster growth and development.

Thank you for the opportunity to share my thoughts with you. I trust you will give this favorable consideration.

Sincerely,

ALLIANCE BANK & TRUST

A handwritten signature in black ink, appearing to read 'G. William Sudyk', written in a cursive style.

G. William Sudyk
President/CEO