



BANK OF WISCONSIN DELLS

October 29, 2008

Robert E. Feldman
Executive Secretary
FDIC
550 – 17th St. N.W.
Washington, D.C. 20429

Re: Comments on Proposed Temporary Liquidity Guarantee Program

Dear Mr. Feldman:

As the CFO of Bank of Wisconsin Dells, which is located in Wisconsin Dells, WI, I would like to comment on the proposed Temporary Liquidity Guarantee Program. As I am sure you are aware, Kansas Bankers Surety Co. is in the process of canceling their Excess Deposit Guaranty Bond coverage. Our bank has about \$50,000,000 in municipal deposits, of which \$19,000,000 is presently insured by Kansas Bankers Surety.

Servicing the needs of municipalities has always been a niche of the Bank of Wisconsin Dells. The cancelation of the excess deposit insurance has put us in a precarious position as we do not have enough pledgeable securities to replace the \$19,000,000. The CDARS program will work for a portion of that volume, however, a large portion of the municipal deposits are held in liquid operating accounts and therefore a certificate of deposit does not serve their needs.

If the FDIC would extend the Noninterest- Bearing Guarantee program to cover the Now account balances of municipalities, it would be a great benefit not only to us but to the municipalities. If we are unable to secure the deposits, the municipalities will be forced to spread their operating accounts amongst several banks. The Bank of Wisconsin Dells is a community bank that uses these deposits to lend back into our community. If the municipalities are forced to move deposits to the corporate banks, the funds will leave the community. These are local taxpayer dollars that should be reinvested back in the local economy.

By extending the Guarantee Program to cover municipal now accounts it will not only benefit our bank and our community, but communities and community banks throughout the nation.

Thank you for your consideration.

Larry L. Gehrke
Senior Vice President/CFO

cc: Sen. Russell D. Feingold
Sen. Herb Kohl
Rep. Tammy Baldwin
Rep. Ron Kind
Rep. Thomas E. Petri