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**From:** Neil Joiner [mailto:njoiner@bankofdooly.com]

**Sent:** Thursday, March 05, 2009 8:43 AM

**To:** Comments

**Cc:** Joe Brannen; Elaine Demarest

**Subject:** special assessment

I certainly appreciate the need to rebuild the FDIC Insurance Fund. With the plan as it is proposed, however, it will add to the current problems and further deplete the fund. This would seem a clear opportunity for a government loan while the banks restore the fund over a longer time period. It is also a reminder that for long term planning the fund should have more cushion as should our loan loss reserves.

For the past decade or so the accounting profession has discouraged increasing the loan loss reserves beyond what could be documented as potential exposure. It is not just the "known" exposure we need to provide for but also the "unknown" which now has proven much more extensive. Had our industry had more of a cushion we would not be relying so heavily on FDIC at this point.

Thank you for your consideration.

Neil Joiner  
Bank of Dooly  
229-268-4707 Ext. 221