

December 13, 2010

The Honorable Sheila Bair  
Chairman  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429-9990

Dear Chairman Bair:

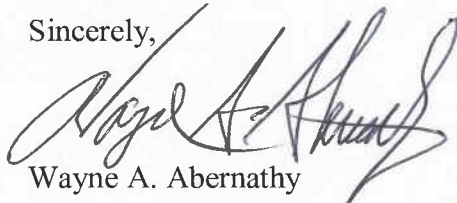
I am writing to urge the FDIC to extend the comment period regarding the changes to the large bank risk-based assessment methodology. In conversations with many of our large bank members that would be subject to this rule, it is very apparent that the 45 day comment period (ending on January 3, 2011) does not provide adequate time to understand fully the implications of the changes and to provide thoughtful comments.

The proposed methodology is very complicated and bankers have expressed frustration that they cannot duplicate the results using the FDIC's calculator. We urge the FDIC to provide bank specific data to all the banks subjected to the rule so that they can clearly understand the calculations being considered and have an opportunity to evaluate the consequences of changes to those variables. Without this information, it is difficult to understand fully the changes proposed. Given the small number of banks affected by the rule, we believe that this is not an unreasonable request.

The banks affected by this rule are also endeavoring to understand the impact of this risk-based rule in light of the separate proposal that implements the Dodd-Frank Act requirement for an expanded assessment base. The two changes together are creating great confusion about the impact each will have on the largest banks.

Because of the complexities of the proposed large bank risk based assessment system, and the significant financial impact it may have on institutions, we believe that it is appropriate to give more time for banks to review and comment on this proposal.

Sincerely,



Wayne A. Abernathy