Cambridge State Bank



THE BANK for the Cambridge Community

April 10, 2009

Robert E. Feldman, Executive Secretary Attention: Comments Federal Deposit insurance Corp

VIA EMAIL

Dear Mr. Feldman,

I would like to take the time to comment on various aspects of the FDIC's proposed Loan Legacy Program. These comments come from my prospective as a President of a \$100 Million Community Bank located in the suburban area of Madison, Wisconsin. Our bank is tied directly to the housing market and its collapse has been very painful for us.

I have several comments:

- Don't make the minimum pool size so large that banks like mine can't participate. The \$1 Billion minimum that was mentioned in yesterday's conference call is way too high.
- Assimilate the pools by geographical area, maybe even by state, so that potential local investors would have a higher comfort level for pools. This should produce higher values for the assets and provide for easier management
- 3. Allow smaller banks to work together to form pools but require that the participating members creating the pool work out the sharing of any monies generated amongst themselves prior to submitting the pool.
- 4. The investors that purchase the pool should manage the pool but the FDIC should have veto power over any proposed manager. The manager should also submit a preliminary budget and then quarterly reports to the FDIC so the agency can monitor and protect its investment.

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Thank you for your consideration. I feel the program has great merit; it could help banks rid themselves of toxic assets and allow them to put their time and energy into growing their bank and the economy.

Sincerely,

Jon F. Sustarich

President, Cambridge State Bank