


From: Paul Goodpaster <pgoodpaster@tcbanytime.com>
Sent: Friday, July 21, 2023 11:36 AM
To: Comments
Subject: [EXTERNAL MESSAGE] May 22, 2023 - Special Assessments Pursuant to Systemic Risk Determination - Notice of Proposed Rulemaking; Comment Request (RIN 3064-AF93)



Mr. James P. Sheesley
Assistant Executive Secretary
Attention: Comments—RIN 3064-AF93
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Dear Mr. Sheesley:



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July 21, 2023

Federal Deposit Insurance Corporation

Re: Comments regarding DIF Special Assessment

To Whom It May Concern:

I am submitting this letter in response to the FDIC's request for comment on the special assessment proposal as a result of the systemic risk determinations announced after the SVB and SBNY bank failures. As you are aware, community bank business models are much different than those of the large "systemic" financial institutions. There is a distinct difference and that translates to Risk. It's been proven time and time again that the large systemic institutions pose a much greater risk to the DIF than the smaller community banks.

I am CEO of a small \$200 million community bank that serves markets in suburban and rural East/Central Kentucky. We primarily provide credit to consumers for residential purposes, to farmers for Ag related purposes and to small businesses for operating needs. In addition, the level of uninsured deposits on the balance sheet consistently remains at very low levels. A special assessment that includes community banks would disproportionately impact our earnings which would negatively impact our ability to continue current service levels.

This is not a "one-size-fits-all" approach and I want to applaud the FDIC's decision to exempt community banks with fewer than \$5 billion in assets from paying the special assessment. I strongly support this approach.

Thank you for allowing me the opportunity to comment. I certainly hope that the FDIC will remain committed to this approach.

Respectfully submitted,



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Chief Executive Officer

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