



A. Ford Sasser III  
President and CEO

February 6, 2014

Robert E Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, D.C. 20429

Re: Proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policy and Practices of Banks Regulated by the Agencies

Dear Sir:

Rio Bank, located in the Rio Grande Valley of Texas, has been in existence since 1985. We have approximately \$230,000,000 in total assets and eight branches all along the Mexican border in Deep South Texas. We have 84 employees. We are a semi urban bank with a substantial number of Hispanic customers and employees which should not be a surprise since our population is about 95% Hispanic.

For a community bank like ours to survive, especially in these difficult times, they need to meet the banking needs of their customers. As such, having a group of employees that reflect the demographics of our community is essential to our success and survival. We knew that before the Dodd-Frank Act.

Our compliance costs have already increased over the last few years, especially after the passage of the Dodd-Frank Act. We do not have the personnel, the training or the software to compile the various metrics suggested in the proposal. And even if we did, we do not believe there would be a change in our hiring or retention practices. We certainly do not have the ability to assess the diversity practices of our suppliers. If we were required to attempt to do so, it would be just one more expensive regulatory burden that we would have to pass on to our customers.

This "Make Work" proposal would be extremely costly to our customers. Regulatory compliance is costly, and unfortunately, it is the community bank customer that has to pay for it. The Dodd-Frank Act has already caused us to not be able to provide services we were once able to offer our customers and that same Act has caused us to have to increase the fees we charge our customers on other services. Burdening our customers with another "Make Work" regulation that does not benefit either the bank or its customers is not healthy for the community banking business model or those that need community banks for their financial services.

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Please withdraw this proposal and come up with a simpler, more effective and less costly way for community banks, like Rio Bank, to comply with this section of the Dodd-Frank Act. Please do not do this to our customers.

Kindest Regards,



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