

From: Carolyn Snyder <csnyder@bufordresources.com>
Sent: Wednesday, July 12, 2023 4:47 PM
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:

On behalf of over 100-member community banks across the state of Oklahoma, the Community Bankers Association of Oklahoma thanks the FDIC for your proposal to exempt community banks under \$5 billion from the special assessment arising from the failures of SVB and SBNY.

The average size of our member banks in Oklahoma would be less than \$500 million. These institutions should not have to carry the burden for the too-big-to-fail institutions that benefited from the systemic risk determination. It is appropriate that you propose limiting the special assessment to the 113 large banking organizations that do hold large amounts of uninsured deposits.

Community banks did not benefit from the systemic risk exemption and should not shoulder the burden of paying the estimated \$16 billion loss to the fund. The size, rapid growth, and excessive risk of SVB and Signature Bank of New York are not reflective of the community banks in our state. Community banks operate under a completely different model based on personalized relationships, sound underwriting and risk management that protects our customers and communities across the state.

As I said to you in my letter dated April 24, 2023, our community banks in Oklahoma do not pose systemic risk to the nation's financial system. These banks are, however, systemically important to their communities and the customers they serve. Your proposal to exempt them from the assessment will help our banks to continue providing for those communities they serve.

The Community Bankers Association of Oklahoma applauds the FDIC for avoiding a one-size-fits-all approach to this assessment and we greatly appreciate you exempting community banks from that assessment.

Sincerely,



Craig Buford
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