



ALABAMA BANKERS ASSOCIATION

Tuesday, July 18, 2023

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

Via Electronic Delivery to: comments@fdic.gov

Re: Special Assessments Pursuant to Systemic Risk Determination
12 CFR Part 327 RIN 3064—AF93

Dear Secretary Sheesley,

The Alabama Bankers Association (“ABA”) represents one hundred twenty financial institutions ranging from local, single-office community banks to regional banks and systemically important financial institutions. We write today to respectfully comment on the proposed amendments to 12 CFR Part 327 (the “Proposed Rule”) as announced under the FDIC’s *Notice of Proposed Rulemaking on Special Assessment Pursuant to Systemic Risk Determination* released in connection with FIL-24-2023 (May 11, 2023).

ABA appreciates and supports that the FDIC proposes to carve out community banks with under \$5 billion in uninsured deposits. These banks – along with mid-sized, regional, and larger banks – provide critical banking services and act as a source of strength for the communities they serve. We urge the FDIC to also do everything possible to further reduce the assessment's size through prudent asset sales and other steps limiting the financial impact on affected institutions.

Finally, we request clarification within the proposed rule to include specific exemptions for accounts holding public funds. Such accounts, with deposit balances often exceeding \$250,000, are secured by marketable securities pledged by the banks themselves and pose no risk to the deposit insurance fund.

We appreciate the opportunity to comment on the proposed rule.

Sincerely,



Scott E. Latham
President & CEO

445 Dexter Avenue, Suite 10025 | Montgomery, Alabama 36104-3775
Phone (334) 244-9456 | Fax (334) 244-9382 | www.Alabama.bank