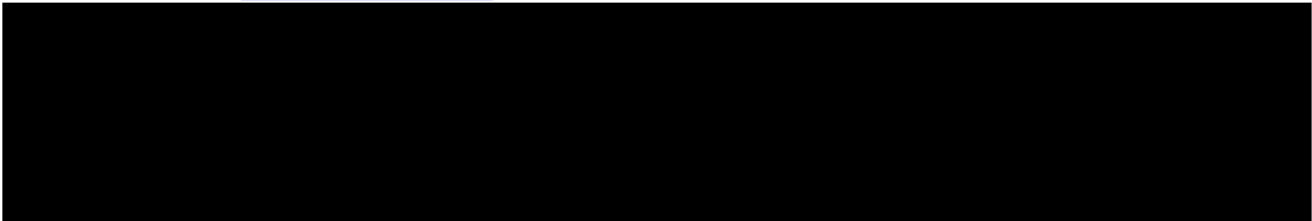


From: [Claire O'Connor](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] May 22, 2023 - Special Assessments Pursuant to Systemic Risk Determination - Notice of Proposed Rulemaking; Comment Request (RIN 3064-AF93)
Date: Thursday, July 20, 2023 11:58:11 AM
Attachments: [ICBA FDIC letter 202307.pdf](#)



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:

I am writing regarding the FDIC's notice of proposed rulemaking, which would implement a special assessment to recover the cost associated with protecting uninsured deposits following the closures of Silicon Valley Bank and Signature Bank.


I am the Chief Community Banking Officer, at National Capital Bank of Washington, which was founded in 1889 and is Washington's Oldest Bank. We are headquartered on Capitol Hill with offices in the Friendship Heights community in Northwest, DC, the Courthouse/Clarendon community in Arlington, VA and the Fox Hill senior living community in Bethesda, MD. We operate residential mortgage and commercial lending offices and a wealth management services division. Our product and service offerings include personal and business deposit accounts, robust eBanking, sophisticated treasury management solutions—all delivered with top-rated personal service. We are well positioned to serve all the banking needs of those in our community.

As a community bank, we are strong, and the banking system remains resilient. Community banks like NCB have always been focused on safety and soundness as a part of our traditional and relationship-based business model. Our bank has a well-diversified deposit base and maintains strong capital levels according to regulatory requirements. We are not in the cryptocurrency business, nor are we heavily leveraged in the tech industry. We take pride in continuing to uphold our founding principle of "customers come first". After all, we live in the community too.

Community Banks should not have to bear the special assessment, as the additional assessment will inevitably drive-up prices consumers pay for products and services across the entire banking industry and will negatively impact community banks' abilities to lend money to their local communities.

I strongly support the FDICs proposal to limit the special assessments to the 113 banking organizations with total assets over \$50 billion. Additionally, I applaud the FDICs decision to exempt community banks with less than \$5 billion in assets and avoiding a one-size-fits-all approach.

Sincerely,



Debra Keats
EVP, Chief Community Banking Officer
National Capital Bank
316 Pennsylvania Ave., SE
Washington, D.C. 20003