

**From:** Jim Brown <jim@thunderdomelaw.com>  
**Sent:** Friday, July 21, 2023 11:59 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:

I write on behalf of the membership of the Montana Independent Bankers Association (MIB). MIB represents Montana's state-chartered community banks.

Not one of MIB's member banks have assets over \$12 billion, and none of MIB's members have in any way caused or been responsible for losses to the Deposit Insurance Fund, either in 2023 or any previous year. It is well known that Montana's community banks operate under a completely different business model. This is a model based on personalized relationships, sound underwriting, and appropriate risk management – all of which protect Montana-based depositors and community banks across the Treasure State.

Given that MIB's member banks are managed in a responsible, risk-appropriate manner, MIB's community banking members strongly support the agency's proposal to exempt community banks under \$5 billion in assets from its proposed special assessment. In adopting this proposal, the FDIC will appropriately use its discretionary authority to assign risk to the types of entities that are known to historically cause losses to the Deposit insurance Fund (DIF). Further, by adopting the proposal, the FDIC will rightly assure that Montana depositors will not be paying for poor management decisions of too-big-to-fail institutions of SVP or Signature Bank.

Again, Montana's community banking industry backs the FDIC's proposal to exempt community banks under \$5 billion in assets from its proposed special assessment.

Thank you for your time and attention to this missive.

Sincerely,

James Brown, Esq.

Executive Director

Montana Independent Bankers Association

Dillon, MT 59725