



- Adams County Economic Development Corporation
- Adams County Industrial Development Authority
- Adams County General Authority

To: comments@fdic.gov
Subject: Comment Request– RIN 3064-AF99

Dear Mr. Sheesley,

My name is Robin Fitzpatrick, and I am the President of the Adams County Economic Alliance, which is based in Gettysburg, Pennsylvania. Our organization is dedicated to the economic wellbeing and growth of both Adams County residents and their businesses. Since our inception in 1989, we've been able to provide personalized and focused resources for retention, expansion, attraction, and workforce development. That desire for localized guidance is also why many of these businesses choose to work with community banks to get their companies up and running. However, a recently proposed rule by the FDIC puts this network of support at risk – especially the ability for community banks to address the needs of their customers.

Here at the Adams County Economic Alliance, we are heavily invested in both the professional and personal success of our residents. Our work goes together with our community banks, who help our small business partners access the loans and other financial tools they need to operate and even expand their offerings. Unfortunately, the FDIC's proposed rulemaking poses an obstacle for community banks that will make it much more difficult for them to obtain the funds needed to provide these essential services and create a less favorable business environment here in Adams County and in towns across the country.

Our smaller banking institutions are pillars of our communities because they truly share the same local commitment as their customers. With so many banking options, including national and international competitors, community banks stay relevant by enhancing their local emphasis with third-party partnerships, such as the Alliance, that provide innovative tools to meet customer needs, attract new depositors, and expand their opportunities for liquidity. I can tell you with dismay that the national banks within our own community have little to no interest in working with small businesses, the core of our economy. Smaller banks thrive when they can tap into modern and diverse streams of capital from apps and other digital channels, but the FDIC is actively working to restrict these options by mislabeling them as risky and less secure. These liquidity methods are an asset to prudent capital management and help our community banks maintain the necessary cash for the loans and other financial needs that small businesses rely on.

We at the Adams County Economic Alliance are helping build the framework for economic opportunity and success for our local businesses. This work is not possible without support from our community banks, so I urge the FDIC to leave the current rules as they are so that entrepreneurs, and small businesses can continue to put their trust in our local banking institutions.

Sincerely,
Robin Fitzpatrick, President, Adams County Economic Alliance
The Adams County Advantage

www.adamsalliance.org