

From: [Seth J. Artz](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] RIN 3064-AG15
Date: Monday, September 22, 2025 9:28:26 AM

Ms. Jennifer M. Jones
Deputy Executive Secretary
Attention: Comments
RIN 3064-AG15
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Dear Ms. Jones,

I am writing in regard to the FDIC's comment request for the proposal to raise asset thresholds and move them to an indexed evolution going forward.

My name is Seth Artz and I serve as EVP, COO/CFO for American Bank & Trust, a \$2B asset bank headquartered in Sioux Falls, SD that is over 125 years old. We have over 200 employees across 20 branches serving over 33,000 customers in the upper Great Plains with their ag, business, and retail/consumer needs.

The proposal in question for Part 363 is one I support, particularly as it will help right-size the asset thresholds commensurate with the risk that is being managed by the regulations. There are many examples of regulation involving threshold criteria that was established decades ago but nothing was put in place to keep those thresholds calibrated to the changing world. As a consequence, banks like ours have had to commit financial and personnel resources to the processes and infrastructure that underpin monitoring and management of the business to meet those thresholds at a much higher proportion than when they were first established.

In addition, when looking at the concentration of the banking industry today, well over 90% the sector is concentrated on just a few dozen banks. Systematically, this means the risk to the industry by following through with the proposal to modernize the thresholds is naturally minimized. To that end, the thresholds could even be increased further...for example instead of a \$5B threshold for internal control audit attestation and board composition, a \$10B level might make just as much sense.

For our part, this right-sizing of thresholds (and hopefully others like CTR) frees up a significant amount of human and financial resource that we would re-deploy into key areas of customer service, fraud prevention, and technology utilization.

I appreciate the consideration being given to this regulation and look forward to seeing the proposal for increased thresholds and indexing come to life, as both will give our bank some

breathing room to be a better bank for our customers and communities.

Sincerely,

Seth Artz
EVP, COO/CFO
American Bank & Trust