

BRADFORD NATIONAL BANK

A Real Community Bank

Michael Ennen
President & CEO
Bradford National Bank
Greenville, IL

September 22, 2025

Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

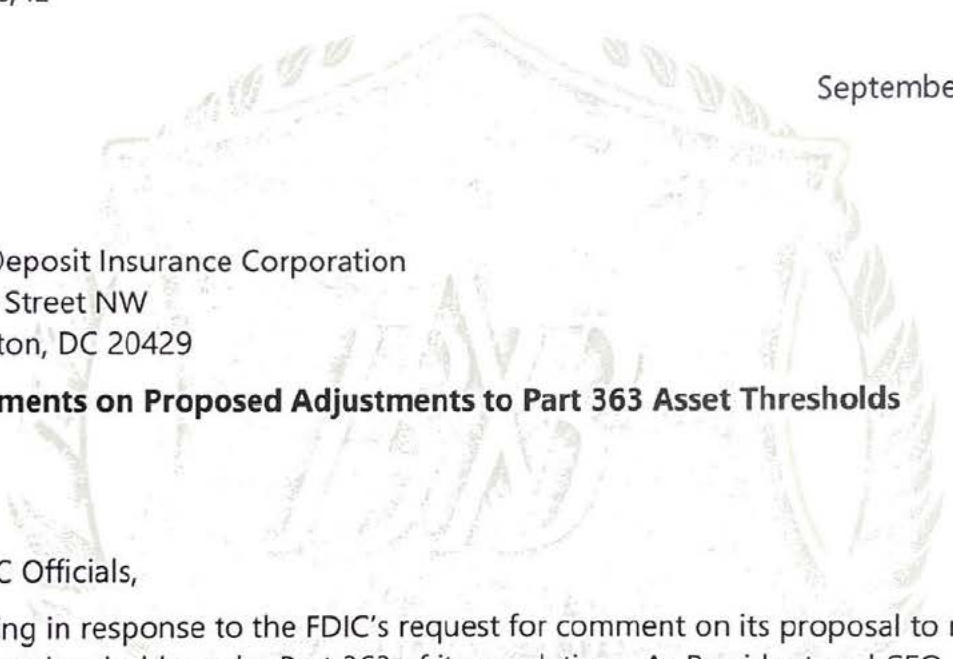
RE: Comments on Proposed Adjustments to Part 363 Asset Thresholds

Dear FDIC Officials,

I am writing in response to the FDIC's request for comment on its proposal to raise and index asset thresholds under Part 363 of its regulations. As President and CEO of Bradford National Bank, a community-focused institution headquartered in Greenville, Illinois, I appreciate the opportunity to provide feedback on this important initiative.

Founded in 1867, Bradford National Bank is one of the oldest locally-owned financial institutions in Illinois. We proudly serve communities across Bond, Madison, and Washington counties, offering modern financial products with a personal touch. Our mission has always been to support local families, small businesses, and farmers with the financial tools they need to thrive. We are deeply embedded in our communities, and our staff are not just bankers—they are neighbors and friends.

I strongly support the FDIC's proposal to modernize the outdated thresholds in Part 363. The current limits, last updated in 2005, no longer reflect the realities of today's banking landscape. Due to inflation and industry consolidation, many community banks like ours have grown in asset size without a corresponding increase in complexity or risk. Yet we are now subject to costly audit and reporting requirements that were originally intended for larger, more complex institutions.



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The proposed increase in the threshold for auditor attestation regarding internal controls—from \$1 billion to \$10 billion—is especially welcome. This change would better align regulatory requirements with actual risk profiles and allow community banks to redirect resources toward serving our customers and communities more effectively.

Additionally, I support the FDIC's plan to index these thresholds to inflation using the CPI-W, with adjustments every two years or more frequently if inflation exceeds 8%. This approach will help prevent future misalignment and ensure that regulatory burdens remain proportionate over time.

As a rural bank, I also appreciate the FDIC's attention to the challenges faced by institutions like ours in meeting enhanced audit committee requirements. Recruiting qualified committee members with financial expertise in rural areas is often difficult, and I encourage the FDIC to consider additional flexibility in this area.

Thank you for your efforts to modernize these thresholds and for seeking input from community banks. I urge the FDIC to finalize this proposal promptly and continue engaging with community bankers to identify other areas where regulatory relief can be responsibly provided.

Sincerely,



Michael D. Ennen
President & CEO
Bradford National Bank

