

From: [Carrie Havas](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] RIN 3064-AG15
Date: Monday, September 22, 2025 9:50:33 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

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 to express my support for the proposal to raise asset size thresholds in relation to Part 363 of the FDIC's Rules and Regulations. I am the Chief Risk and CRA Officer for Brentwood Bank, a 100-year-old community bank located in Western Pennsylvania that has just six branches and fewer than 100 employees. Brentwood Bank just crossed the \$1 billion threshold last quarter-end and the financial burden created by additional compliance costs, employee resources, and external audit expense that the current asset thresholds set by Part 363 impose will be significant for us. These resources could be better used to serve and invest in our local community. My understanding is that the asset thresholds set by the regulation have not revised in twenty years and are no longer meaningful given the consolidations and inflation that has occurred in the industry during this time. Regular indexing of the thresholds should occur automatically to ensure that community banks such as mine are not unfairly burdened when the risk we pose to the industry and insurance fund are low. It just makes sense.

Thank you for providing me and other community bankers with the opportunity to submit comments on this proposal. My hope is that the proposal to modernize the thresholds in Part 363 is finalized quickly as Brentwood Bank is directly affected considering our asset size now exceeds \$1 billion. I would also encourage the FDIC to identify other outdated regulatory thresholds that warrant review and consider their modernization as well.

Sincerely,

Carrie Havas
SVP Chief Risk and CRA Officer

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