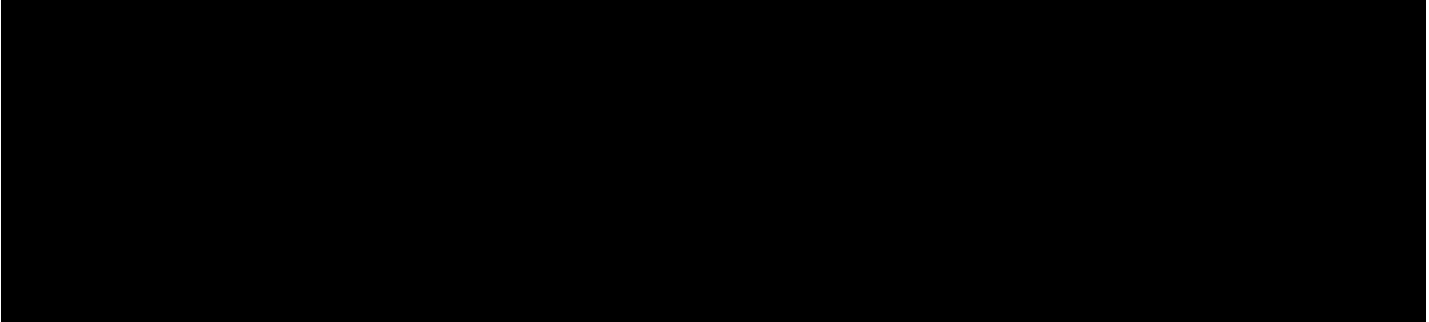


From: [David Long](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] Bryant Bank Tuscaloosa, Alabama Response Letter - RIN-3064-AG15 Adjusting and Indexing Certain Regulatory Thresholds
Date: Friday, September 26, 2025 1:01:39 PM



We are pleased to offer the attached response letter regarding RIN 3064-AG15 requesting response by Friday, September 26, 2025. We appreciate the opportunity to comment and thank you for your proposal. If we need to do anything different to submit the response letter, please let me know.

Thanks,
David

David Long
Executive Vice President
Correspondent Banking/Capital Markets

BRYANT  **BANK**



September 26, 2025

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

Submitted via Email: Comments@FDIC.gov
Subject RIN 3064-AG15

Dear FDIC Representative:

I am writing this response letter in regards to FDIC Request for Comment, RIN 3064-AG15 for the FDIC proposal to raise and index asset threshold adjustments to Part 363. We are in favor and support the proposed revisions to Part 363.

I am President of Bryant Bank, a \$2.7 billion community bank in Tuscaloosa, Alabama with 18 offices in the State of Alabama. Our bank also has a correspondent banking division that serves community banks of all sizes only in the State of Alabama. The proposals in this Request of Comment would not only be impactful to our bank but would be helpful to community banks throughout our state and the country.

The proposal to raise the asset threshold for auditor's attestation and reporting regarding effectiveness of Insured Depository Institution (IOI) management's internal controls over financial reporting from \$1 billion to \$10 billion and the threshold for additional requirements for audit committee composition (include members with banking or financial management expertise; provide access to outside counsel) from \$3 billion to \$5 billion would be impactful to our organization. We work closely with our internal and external auditors regarding our internal controls and processes and procedures on an ongoing basis. Our culture and standard business practices would not change with the higher thresholds but the revision would assist from a cost perspective and would allow us to phase-in some provisions that would be more beneficial as we progress to the increased ranges of assets.

We also support the FDIC's plan to index these thresholds to inflation going forward ensuring that regulatory requirements remain analogous to the size of the financial institution. This proposal will also save the industry and the FDIC from having to revisit these provisions in future years.

We appreciate and are thankful for your time and efforts to consider the threshold changes and indexing for the future to allow regulation to better align with the size and business of the community bank model. This proposal allows for equitable regulation as each community bank continues to grow while serving their communities.

Thank you for the opportunity to comment and for your consideration of the proposed updates to Part 363. We would appreciate the proposals to become enacted as regulatory standards of the industry.

Sincerely,

Claude D. Edwards
President

