



September 26, 2025

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 regarding the FDIC's request for comment on its proposal to raise and index its asset size thresholds for regulatory reporting purposes.

As the SVP, Chief Financial Officer of Cape Ann Savings Bank ("the Bank"), a \$980 million mutual savings bank located in Gloucester, Massachusetts, I strongly agree with your proposal to increase the asset threshold levels that have remained unchanged since the early 1990s.

Our Bank has served its communities since 1846 and its safe and sound stewardship continues into the present time as we strive to offer the convenient products and services our customers desire. The Bank contributes over \$400 thousand to over 150 non-profit organizations each year along with educational scholarships. The Bank's dedicated employees embody the spirit of community involvement with numerous volunteer hours to a variety of organizations serving the Cape Ann area, amplifying our personal investment in the growth and prosperity of Cape Ann while reaffirming our role as a reliable partner in our local growth and a true pillar of the community.

More banks than ever are subject to Part 363, making updates necessary to better align the regulatory burden to the risk. In particular, when Congress enacted FDICIA, it expressly exempted small institutions from the expensive independent annual audit and reporting requirements and gave the FDIC the discretion to increase the exemption threshold as needed over time. I am supportive of this long-overdue proposal to raise Part 363's applicability threshold. Furthermore, as small banks are not responsible for the systemic risk concentrated within the nation's largest, most complex financial institutions, the proposal will achieve meaningful burden reduction without sacrificing safety and soundness or posing risk to the FDIC's Deposit Insurance Fund.

The increased compliance and administrative costs as well as the time consuming burden of not increasing the asset thresholds would have a detrimental impact on the Bank and could reduce employee's volunteerism efforts in the community. By indexing the thresholds automatically, it would ensure that these asset



thresholds do not remain artificially low in the future, and more effectively align with inflationary changes than an ad-hoc review of the asset thresholds.

Thank you for allowing me to submit this letter on ways to modernize these outdated threshold levels and taking the time to review our comments.

Respectfully submitted,

Diane Walker

Diane Walker
SVP Chief Financial Officer

