



Telephone: [Redacted]
Fax: [Redacted]
www.mycentennial.bank

August 28, 2025

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

Re: RIN 3064-AG15 – Proposed Increases to FDICIA Thresholds

To Whom It May Concern:

On behalf of Centennial Bank, a community bank serving West Tennessee, I am writing in support of the FDIC's proposal to increase the thresholds established under the Federal Deposit Insurance Corporation Improvement Act of 1991 (FDICIA).

The current thresholds, unchanged for decades, no longer reflect the realities of today's banking environment. Many community banks, including ours, have grown modestly in size due to inflation, organic growth, and increased demand for local banking services. However, this growth has pushed institutions into compliance categories that impose significant costs, despite little change in overall risk profile.

For example:

- Audit and internal control requirements under Section 36 of FDICIA can impose costs in the hundreds of thousands of dollars annually. For community banks, these dollars could otherwise be directed toward loans, technology upgrades, or enhanced customer service.
- Compliance burdens scale disproportionately as thresholds are crossed. Requirements designed for large, complex institutions are being applied to community banks whose business models remain straightforward and relationship-driven.
- Regulatory intent is preserved even with higher thresholds, as safety and soundness oversight continues through examinations, risk-focused supervision, and other established regulatory frameworks.

Raising the FDICIA thresholds will allow community banks like ours to devote more resources to serving small businesses, farmers, and families in our markets, without undermining the regulatory safeguards that protect depositors and the financial system.

We further encourage the FDIC to adopt a process for regular adjustments to these thresholds, ensuring they remain aligned with industry growth and inflation over time.

Thank you for your leadership in modernizing these requirements and for recognizing the critical role community banks play in local economies.

Sincerely,

Andrea Browning

Chief Executive Officer

Centennial Bank