From:	JASON E JONES
To:	Comments
Cc:	[redacted]
Subject:	[EXTERNAL MESSAGE] RIN 3064-AG15
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[redacted]

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

Ms. Jennifer M. Jones
Deputy Executive Secretary

Ms. Jones

I currently serve as President of Community Financial Services Bank (CFSB), a $1.4 billion community bank founded in 1890 and headquartered in Benton, KY where we serve the rural area of western Kentucky. I am writing to express our support for the FDIC's proposed updates to Part 363 of the FDICIA regulations.

First, thank you for your work on this issue and for allowing us, as bankers, to tell our story of how these regulations affect our banks. As you know, originally the asset thresholds were set in place to help manage risks of the largest and more complex financial institutions. However, the number of banks has shrunk over the years as they merged or were acquired by larger institutions. The remaining community banks have been the recipients of loans and deposits as many clients still prefer to work with our local banks. This, along with our hard work to increase our market share, has resulted in the increase in asset sizes of many community banks, but our risk profile and operating practices have remained virtually the same. We still operate in the framework where we know our clients and their businesses. The regulatory practices that we put in place when we crossed the $1B threshold due to FDICIA caused us to hire at least 5-7 additional team members. The duties that must now be performed by these team members have not necessarily decreased the risks of our bank but have cost us time and resources that we could have put forth toward serving our clients and our communities.

With no change in the asset thresholds since 2005 it does seem time to establish new thresholds (and an index to increase these accordingly) that make more sense due to the actual risks that our banks pose. I believe that the proposal that has been laid out makes sense and allows our banks to focus on what we do best which is being the economic driver of our communities to help them grow. We do not want to take on unnecessary risks that will put the communities and clients in jeopardy and we will continue to closely monitor those risks as that is part of our job. There is still ample oversight in place, if these thresholds are increased, for us to remain safe and sound financial institutions. I firmly believe that we, as bankers, want to continue working with clients and we are not willing to put undue or unnecessary risks over profit. If our banks fail, our communities, clients, teams, and shareholders all fail. This is not in anyone's best interest and would not serve a purpose to anyone.

Thank you for your work on this issue and your help in keeping our banks safe but also allowing us to work within reasonable guidelines of safety and soundness. I strongly urge that you move forward with the proposed changes that will ultimately help our banks help our clients which is the goal of our entire financial system.

Regards

Jason Jones | President
[redacted]

Benton Banking Center
[redacted]

CFSB

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