



MAKING THE POSSIBLE, POSSIBLE

Deputy Executive Secretary
Attention: Comments
RIN 3064-AG15
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Re: Comments on FDIC Proposal to Adjust and Index Part 363 Thresholds

Dear Ms. Jones,

On behalf of Crown Bank, a \$450 million locally owned and operated community bank serving the Minneapolis–St. Paul, Minnesota region, I write in strong support of the FDIC’s proposal to modernize Part 363 thresholds.

At Crown Bank, our business model is simple. Decisions are made here. Loans are made here. Deposits are held here. We invest in our neighbors, sponsor and donate to more than 50 nonprofit organizations each year, and our bankers proudly volunteer their time and talent to strengthen the community we call home. We are proud to be part of our community’s lifestyle and spirit.

Unfortunately, the outdated thresholds under Part 363 require us, and many other community banks, to devote significant time, expense, and resources to compliance obligations that were never intended for institutions of our size or risk profile. Every dollar and hour spent on duplicative regulatory requirements is one less we can put toward small business loans, nonprofit partnerships, and direct investments that make a difference for our customers and neighborhoods.

For this reason, we applaud the FDIC for its proposal to raise and index Part 363 thresholds. These changes are long overdue and will ensure that regulatory requirements better match the risks posed by institutions. We also encourage one important modification: raising the independent auditor attestation threshold for internal controls over financial reporting to \$10 billion rather than the proposed \$5 billion. A higher threshold more accurately reflects today’s banking environment and ensures that resources are focused where systemic risk is concentrated, at the nation’s largest and most complex banks.

Finally, we support indexing thresholds to inflation, so they remain current going forward. This will provide needed certainty and predictability, enabling community banks like Crown to plan responsibly as we continue to grow.

Thank you for your leadership on this important issue. By modernizing Part 363 thresholds, the FDIC will reduce disproportionate burdens on community banks and allow us to dedicate more of our resources to the customers and communities we serve.

Respectfully,
Jackie Herman

Chief Financial Officer
Crown Bank