

**From:** [Michelle E. Urban](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] RIN 3064-AG15  
**Date:** Friday, September 26, 2025 4:42:04 PM

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 asset thresholds. I am a risk officer with The Dime Bank, a \$1.1 billion community bank located in Honesdale, Pa. The bank has been in existence since 1905 serving our local community by helping with our customers' lending and deposit needs. We support our local communities by being their total financial partner including small business lending, providing financial support to hundreds of local organizations as well as volunteering time and support. We support our communities because we couldn't be here without them.

I support the proposal and encourage the FDIC to issue a final rule quickly so that community banks can receive relief from the regulatory burden posed by Part 363's outdated thresholds. These thresholds were last updated in 2005 and since that time, many banks including mine reached that threshold mainly from the influx of deposits from the pandemic stimulus from our government. These thresholds have not been adjusted in decades and now many institutions that were never intended to have to comply are now subject to these requirements. The compliance costs for my bank have risen substantially that could be used to continue to invest in our community. Those costs include both internal and external resources that will continue to increase each year. A \$10 billion threshold would better align regulatory requirements with the reality of today's banking and prevent banks like mine from expensive compliance that are meant for large banks that pose more risks. Community banks like the one I work for already have sound and prudent banking principals including controls that are meant to protect the bank and its customers. The proposed \$5 billion threshold would still impose a burden on community banks.

Thank you for the opportunity to submit comments on the proposal as well as for your efforts to modernize outdated thresholds.

Sincerely,

Michelle Urban

Risk Officer

The Dime Bank

