

From: [Larry Thompson](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] RIN 3064-AG15
Date: Thursday, September 18, 2025 11:56:25 AM



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 would like to comment on the FDIC 's proposal to adjust the asset thresholds in FDICIA Part 363.

My bank is First Montana Bank, we are a \$550 million community bank operating in western Montana with ten branches in eight communities. We service our communities by providing commercial, real estate and consumer loans, and offer attractive deposit rates allowing our customers to grow there deposits over time.

While I support the proposal in its entirety, I specifically want to state my support for the proposed adjustment to increase the \$500 million threshold requiring annual audit and reporting requirements to the \$1 billion level subject to indexing.

Our bank had \$324 million in total assets in March 2020, and then as I am sure you are aware, due to government stimulus things took off like a rocket and pushed us over the \$500 million mark by June 2022.

We were the same bank, operating at the same level of complexity with the same risk profile, but all of a sudden, not due to any action on our part we were forced to incur the expense and inconvenience of an audit and due to the limitations imposed by part 363 we needed to hire a second CPA firm for financial statement preparation and tax work. This proposal is a "common sense" approach to fixing something that in my opinion has been broken for years.

I would like to thank you for allowing me to comment on this proposal, and I would like to encourage you to approve it as soon as possible.

Sincerely

Larry Thompson

Executive Vice President and Chief Financial Officer

First Montana Bank

