

From: [Haynes Standard](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] RIN 3064-AG15
Date: Thursday, September 18, 2025 8:08:29 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,

First State Bank is in full agreement with your proposals to increase the level of required Part 363 asset thresholds for additional types and requirements for independent annual audits and reporting. These thresholds have not been changed since they were originally adopted with FDICIA. Our Bank is nearing the \$500 million thresholds presently and will be affected by the current threshold pretty quickly if it is not changed. We also strongly believe that it is a wise procedure to include inflationary adjustments going forward to whatever threshold is set as the new amount. Simply having to comply with the present threshold independent audit guidelines will increase our current audit and review costs by anywhere from 50% to 100% and will not result in a materially improved independent audit process, only including more audit parties and requirements for management's certification that mandated operational controls are performed independently. Banking, simply through inflation, can not simply be measured by a set asset threshold, at least not for 20 to 30 years. Bank total assets have grown significantly just because of inflation and the overall financial improvement for our customers. Another large impact was the COVID liquidity cash flow to our customers which was not planned nor expected by banks. Please make these changes as per your proposal. Thank you for the opportunity to comment.

Haynes Standard, Jr.

CFO/EVP

First State Bank

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