

**From:** [Will Harrington](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] RIN 3064-AG15  
**Date:** Thursday, September 25, 2025 5:20:51 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 in response to the FDIC's request for public comment regarding its proposed changes to asset thresholds under Part 363. I serve as the Chief Executive Officer of Foresight Bank, a community bank with \$417 million in assets, headquartered in Plainview, Minnesota, with branch locations in Eyota and Rochester.

For over 123 years, Foresight Bank has provided loan and deposit services to local families, farms, and businesses. Our lending practices are often more flexible than those of larger financial institutions, due to our close relationships with customers and the agility afforded by our size. This flexibility enables us to finance homes, farms, and businesses that may not meet the criteria of larger lenders. Our below-average loan loss rates demonstrate that this approach aligns with principles of safety and soundness.

I support the proposed revisions to Part 363 and respectfully urge the FDIC to finalize the rule promptly. As Foresight Bank approaches the \$500 million asset threshold, the prospect of complying with the current requirements presents a significant challenge for a bank with just 49 employees. The burden of managing additional audit obligations would divert valuable resources from activities that more directly reduce risk, strengthen internal controls, and enhance service to our community.

Moreover, recruiting qualified audit committee members poses a substantial difficulty, particularly given the acute shortage of accountants in our region. For reference, please

see the article titled “*Minnesota pathways bills move closer to law*” (available at: <https://www.mncpa.org/resources/publications/perspectives/april-2025/pathways-bill-advances-in-minnesota-senate>), which outlines legislative efforts to address this issue.

Thank you for your attention to this matter and for your commitment to modernizing outdated regulatory thresholds. I appreciate the opportunity to provide input.

Sincerely,

Will Harrington, JD, CFA

Chief Executive Officer

Foresight Bank

