



**Independent
Bankers
Association
of Texas**

September 26, 2025

Jennifer M. Jones, Deputy Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
RIN 3064-AG15

Tracy Harris
IBAT Chairman
Texas Regional Bank, Harlingen

Greg Wilson
IBAT Chairman-Elect
Lamar National Bank, Paris

Gabe Guerra
IBAT Secretary-Treasurer
Kleberg Bank, Corpus Christi

Christopher C. Doyle
IBAT Immediate Past Chairman
Texas First Bank, Texas City

Rick Jamieson
Chairman
IBAT Leadership Division
First State Bank, Gainesville

Bradley H. Tidwell
Chairman
IBAT PAC Committee
VeraBank, Henderson

Kevin W. Monk
Chairman
IBAT Education Foundation
Alliance Bank, Sulphur Springs

Christopher L. Williston VI, CAE
President and CEO
IBAT, Austin

Re: Adjusting and Indexing Certain Regulatory Thresholds

Dear Ms. Jones:

The Independent Bankers Association of Texas ("IBAT") provides the following comments on the Notice of Proposed Rulemaking ("proposal") issued by the Federal Deposit Insurance Corporation ("FDIC") entitled Adjusting and Indexing Certain Regulatory Thresholds.

SUMMARY: The Federal Deposit Insurance Corporation (FDIC) is inviting comment on a proposed rule that would amend certain regulatory thresholds in the FDIC's regulations to reflect inflation. Specifically, the proposal would generally update such thresholds to reflect inflation from the date of initial implementation or the most recent adjustment, and provide for future adjustments pursuant to an indexing methodology. The changes set forth in this proposal would provide a more durable regulatory framework by helping to preserve, in real terms, the level of certain thresholds set forth in the FDIC's regulations, thereby avoiding the undesirable and unintended outcome where the scope of applicability for a regulatory requirement changes due solely to inflation rather than actual changes in an institution's size, risk profile or level of complexity.

Below is a direct quote from the proposed Rule:

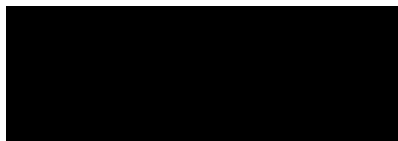
'Most of the dollar-based thresholds in part 363 have been in place for more than 30 years.'

During that same 30-year period, the total asset size of banks increased while the actual number of banks decreased. Thresholds from 30 years ago are clearly outdated and place an unreasonable compliance burden on Texas community banks while at the same time impeding growth. IBAT has urged each of the regulatory agencies to update rules and supervisory approaches to account for economic growth and changes in the banking industry and this situation is clearly an example of that need.

We concur with the Conference of State Bank Supervisors (“CSBS”) in that “...the FDIC is making long overdue changes to its Federal Deposit Insurance Corporation Improvement Act regulations – raising asset thresholds that trigger compliance with independent audit committee and internal control assessment requirements. Those thresholds were set in 1993 and 2005, respectively, and have not been updated to reflect changes in the banking industry over the intervening decades.”ⁱ

Our community bankers support this effort to tailor federal bank regulation and supervision to promote community banking and economic growth in the communities they serve across the great state of Texas.

Very truly yours,



Christopher L. Williston IV
President & CEO
Independent Bankers Association of Texas

ⁱ Conference of State Bank Supervisors [Adjusting and Indexing Certain Regulatory Thresholds](#) dated September 24, 2025