

April 23, 2026

Department of the Treasury
Office of the General Counsel
1500 Pennsylvania Avenue
Washington, DC 20220
RIN 1505-AC90

Federal Deposit Insurance Corporation
550 17th Street NW
NW Washington, DC 20429
RIN 3064-AG19

Financial Crimes Enforcement Network
Regulatory and Strategic Affairs Division
2070 Chain Bridge Road
Suite 200
Vienna, VA 22182
Docket No. FINCEN-2026-0100
RIN 1506-AB73

Office of Foreign Assets Control
U.S. Department of the Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220
RIN 1506-AB73

Re: Request for Extension of Comment Periods for Certain GENIUS Act NPRMs

To Whom it May Concern:

This letter is being submitted by International Bancshares Corporation (“IBC”), a publicly traded, multi-bank financial holding company headquartered in Laredo, Texas. IBC maintains 166 facilities and 256 ATMs, serving 75 communities in Texas and Oklahoma through five separately chartered banks ranging in size from approximately \$500 million to \$9.8 billion, with consolidated assets totaling over \$16.5 billion. IBC is one of the largest independent commercial bank holding companies headquartered in Texas.

IBC submits this letter in support of, and in agreement with, the joint trades letter submitted by the American Bankers Association, the Bank Policy Institute, and the Independent Community Bankers of America requesting a 60-day extension of the comment periods for the Guiding and Establishing National Innovation for US Stablecoins (GENIUS) Act notices of proposed rulemaking issued by the Department of the Treasury, the Federal Deposit Insurance Corporation, and Financial Crimes Enforcement Network (FinCEN) / Office of Foreign Assets Control (OFAC).

Each of the three NPRMs is substantively tethered to the Office of the Comptroller of the Currency (OCC) proposed rule implementing the GENIUS Act for OCC-supervised entities, which remains open for comment and has not yet been finalized. Therefore, IBC agrees with the joint trades letter that the requested extension, measured from the issuance of a final rule by OCC, is necessary to allow for meaningful public comment.

The GENIUS Act implementation effort involves an unusually large and complex set of proposed rules, each spanning dozens of pages and introducing new regulatory frameworks, definitions, and



compliance obligations. These proposals are not only interrelated, but technically dense and operationally consequential, requiring careful analysis across prudential, consumer protection, and financial-crime dimensions. Expecting meaningful public comment on this body of work within compressed and staggered deadlines, particularly while the OCC's foundational rule remains unfinalized, creates a substantial risk that comments will be incomplete, fragmented, or necessarily provisional. A coordinated extension tied to the finalization of the OCC's rule would better enable informed, constructive input and support a more robust administrative record.

IBC has submitted multiple comment letters on the GENIUS Act and its implementation because the stakes for the banking system and the public safety net are material and immediate. Treasury analysis has estimated that, under certain scenarios, stablecoins could drive deposit outflows of up to \$6.6 trillion, depending in part on whether yield-like incentives are permitted. Publicly reported programs already market stablecoin "rewards" of approximately 4.10%, which replicate interest-bearing deposit economics in substance even if structured through affiliates or distribution partners. That is why careful evaluation of how the proposed rules implement the GENIUS Act's prohibition on interest or yield requires sufficient time and a settled OCC framework.

The downstream consequences are not abstract. For community and regional banks in particular, the credit-creation impact is direct: analysis by the Independent Community Bankers of America estimates that if stablecoin yield is allowed, community banks could face roughly \$1.3 trillion in deposit losses and approximately \$850 billion in reduced lending capacity, impairing credit availability for small businesses, farmers, and the communities we serve.

At the same time, the common narrative that stablecoins are primarily a payments innovation remains overstated. A Federal Reserve Bank of Kansas City briefing estimates that payments account for less than 1% of stablecoin use today, while a substantial share remains tied to crypto finance and related infrastructure. Given the scale of potential deposit flight, the yield/rewards loophole risk, and the resulting safety-and-soundness and public-backstop implications, the agencies will benefit from comments that are integrated and grounded in the final OCC framework.

An extension will promote more thoughtful, coordinated public input and will better support the agencies' efforts to implement the GENIUS Act in a consistent, risk-based manner.

Thank you for your attention to this important matter.

Respectfully submitted,

INTERNATIONAL BANCSHARES CORPORATION


Dennis E. Nixon

President and CEO