

From: [Jason Erdman](#)
To: [Comments](#)

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 comment on its proposal to raise and index asset thresholds under Part 363. As President & CEO of Key Community Bank, a \$115MM community bank headquartered in Inver Grove Heights, Minnesota, I appreciate the opportunity to share our perspective on this important issue.

Key Community Bank has served the Inver Grove Heights community and surrounding region for over 25 years, providing vital financial services to local families, small businesses, and our nonprofit community. Our bank is deeply rooted in community values, with a longstanding commitment to personalized service and responsible local lending that supports economic growth throughout our region.

I am generally supportive of the FDIC's proposal to modernize outdated asset thresholds under Part 363. Updating these thresholds is essential to reflect today's banking environment, reducing unnecessary regulatory burden on community banks like ours while maintaining the safety and soundness of the financial system. When Congress enacted FDICIA, it expressly exempted small institutions from the expensive independent annual audit and reporting requirements and gave the FDIC the discretion to increase the exemption threshold as needed over time. I am supportive of this long-overdue proposal. I would like to offer my support for indexing the thresholds so they will be updated automatically. Indexing is necessary to ensure that these thresholds do not remain artificially low for decades (as they had been previously), imposing an undue burden on banks that pose a low risk to the financial system.

I thank the FDIC for the opportunity to submit comments on this proposal and thank the FDIC for its efforts to modernize outdated thresholds and would like to encourage the agency to further identify and update other outdated thresholds.

Respectfully,

Jason Erdman | PRESIDENT & CEO