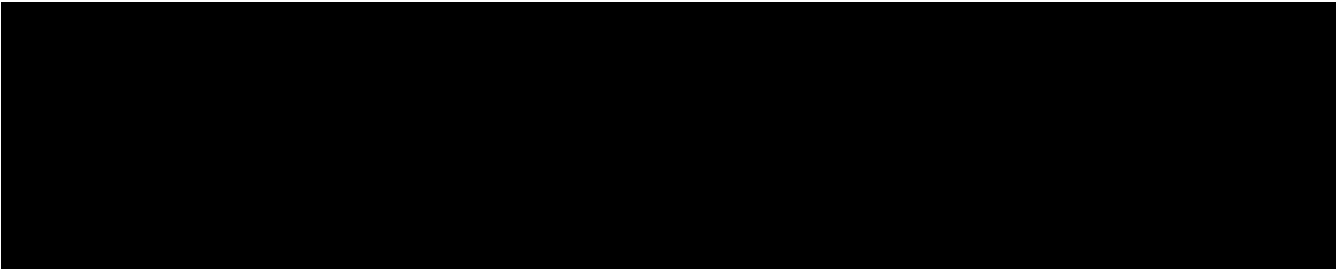


From: [Tommy Bates](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] RIN 3064-AG15
Date: Thursday, September 25, 2025 11:40:58 AM



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,

I am submitting this letter in response to the FDIC's request for comment on its asset threshold proposal. I am Thomas Bates, President & CEO of Legends Bank in Clarksville, TN. Legends is a \$900 million dollar community bank serving northwest middle TN and Nashville. Legends is a 27-year-old traditional community bank focusing on small business, commercial real estate and mortgages. We are active in the communities we serve and recently won the ICBA's Emerging Community Service Award. I support the FDIC's proposal to raise asset threshold levels. Modernizing the asset thresholds under Part 363 will provide needed relief to community banks that have grown due to consolidation and inflation without increasing risk to the banking system.

Part 363 has been front and center for our bank for the last couple of years as we have been approaching the billion-dollar mark in total assets. We still operate a benign institution from a risk standpoint and don't plan to provide any exotic services in the near term. However, as we are preparing for compliance with 363 we have studied the additional costs and estimate it will take at least \$150 to \$200 million in growth to help offset these additional costs even though our balance sheet complexity is not anticipated to change. These additional costs could be better used for risk mitigation for check fraud and other prevailing fraud schemes that AI technology is allowing.

Having been a bank examiner during the S&L crisis, the size of banking has increased exponentially yet regulation seems to be stuck in 1992. Banks over \$10 billion account for 85% of assets in the banking sector as compared to 35% in 1992.

I strongly support the recommended revisions to asset thresholds related to Part 363 and personally I think the level for ICFR attestation and reporting thresholds should be raised to \$10 billion. This would better reflect the original intent of Congress when FDICIA was enacted and should adequately capture risks in the banking system.

In conclusion, I would like to thank the FDIC for its efforts to modernize supervisory thresholds and for giving bankers the opportunity for input. Our industry appreciates this fresh new look and forward-thinking mentality of our primary regulator.

Sincerely,

Thomas Bates, Jr.

Legends Bank, CEO

