OREGON BANKERS ASSOCIATION

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September 26, 2026

Sent Via Electronic Delivery: comments@FDIC.gov

Ms. Jennifer Jones
Deputy Executive Secretary
Attn: Comments (RIN 3064-AG15)
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Re: Adjustment and Indexing of Regulatory Thresholds (RIN 3064-AG15)

Dear Ms. Jones:

On behalf of the Oregon Bankers Association and the Community Banks of Oregon (collectively "OBA") and its membership of Oregon state and national banks, we appreciate the opportunity to comment on the above-referenced proposed rule ("Rule") from the Federal Deposit Insurance Corporation ("FDIC"). OBA is the full-service trade association for the banking industry in the state of Oregon. Our organization represents banks of all sizes and is the voice of the Oregon banking community before federal and state entities. As noted below, we are supportive of the proposed Rule.

Comments

The purpose of the Rule, as noted by FDIC, is to update certain regulatory thresholds to reflect inflation, including those under 12 CFR part 363 related to annual independent audit and reporting requirements, and to adjust those thresholds in the future based on an indexing methodology. The Policy Objectives of the proposed Rule further state that "The adjustments provide for in this proposal are intended to help preserve, in real terms, certain threshold levels in the FDIC's regulations, thereby avoiding the undesirable and unintended outcome where an institution becomes subject to additional or more stringent regulatory requirements due solely to inflation rather than the actual changes in the institution's size, risk profile or level of complexity." We applaud the FDIC's desire to address the impact of inflation on regulatory thresholds. Our member banks are supportive of this modernization and offer the following in support of the Rule.

- The proposed changes are appropriate and will provide real benefit to banks and the banking industry without sacrificing safety or regulatory oversight. Simply applying an inflation adjustment retroactively over the last 34 years would raise the current thresholds significantly (e.g., $1 billion would increase to $2.4 billion). We would hope that static thresholds in regulation generally would be replaced in favor of inflation-indexed thresholds.

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- The dearth of Oregon community banks that have crossed and remained over $1 billion is stark. A contributing factor is the impact that becoming subject to the Federal Deposit Insurance Corporation Improvement Act ("FDICIA") poses. This consideration is often factored into growth and planning discussions. There are significant hard and soft costs to being subject to FDICIA, as well as significant time and money directed towards the preparation and expectation of when a bank would cross the threshold (i.e., a bank doesn't just incur time and costs the year it is subject to a new threshold, but in the years leading up to it).

- Indexing to inflation ensures that the thresholds stay current and relevant to the intent and scope of the act.

- The proposed changes to the thresholds would help smaller banks navigate the audit committee independence rule without increasing risk to the fund. Further, the proposal increases a smaller bank's opportunity to remain a family-owned community bank.

- Adoption of the new thresholds and future inflation-indexed threshold levels would ease regulatory and compliance burdens on banks, especially community banks that are not able to take advantage of compliance economies of scale. This would reduce costs to the bank.

Conclusion

We appreciate the opportunity to offer comments regarding the proposed Rule and would be happy to provide additional feedback if requested. If you have any questions, please feel free to contact us.

Best regards,

[redacted]

Kevin T. Christiansen
SVP & Government Affairs Director
Oregon Bankers Association & Community Banks of Oregon

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