



Andrew Ryback
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Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

RE: Comments on FDIC Proposal to Raise and Index Asset Thresholds under Part 363

Dear FDIC Officials,

I am writing in response to the FDIC's request for comments on its proposal to raise and index asset thresholds under Part 363 of its regulations. As President and CEO of Plumas Bank, a \$2.2 billion community bank headquartered in Quincy, California, I strongly support the proposed changes and appreciate the agency's efforts to modernize these outdated thresholds.

Plumas Bank has proudly served rural communities across northeastern California and northern Nevada for over four decades. Our bank plays a vital role in supporting small businesses, farmers, and families in regions that are often underserved by larger financial institutions. As a rural bank, we face unique challenges in recruiting qualified audit committee members and managing regulatory burdens that were originally intended for much larger, more complex institutions.

The proposed threshold increases are long overdue. The current limits—unchanged since 2005—no longer reflect the realities of today's banking landscape. Inflation and industry consolidation have significantly increased the number of community banks subject to Part 363 requirements, despite their relatively low risk profiles. Raising these thresholds will provide meaningful regulatory relief without compromising safety and soundness.

I also urge the FDIC to raise the threshold for auditor attestation regarding internal controls over financial reporting to \$10 billion, rather than the proposed \$5 billion. Banks between \$5 billion and \$10 billion often maintain community-focused business models and lack the complexity of larger institutions. A \$10 billion threshold would better align regulatory requirements with actual risk and prevent unnecessary compliance costs for banks like ours.

Finally, I support the proposal to index these thresholds to inflation using the CPI-W, with regular updates. This approach will help ensure that thresholds remain relevant over time and prevent future regulatory drift.

Thank you for the opportunity to comment on this important proposal. I commend the FDIC for recognizing the need to modernize Part 363 and encourage continued outreach to community bankers as part of this process.

Sincerely,



Andrew Ryback
President & CEO
Plumas Bank