

**From:** [Harish Sethi](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] RIN 3064-AG15  
**Date:** Monday, September 22, 2025 9:11:22 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 writing regarding the FDIC's request for comment on its proposal to raise and index asset thresholds proposal.**

**I am the EVP/CFO of PointBank, a \$1 billion in asset community bank located in Pilot Point, TX.**

**PointBank is over 140 year old bank and servicing the Denton and Denton county communities over these 140 years. Our bank plays a critical role in the community by supporting the school and local community and small businesses.**

**I support this proposal and encourage the FDIC to issue a final rule quickly so that community banks can receive relief from the regulatory burden posed by Part 363's outdated thresholds.**

**The FDIC should quickly finalize this proposal to modernize the outdated thresholds in Part 363 and give needed relief to community banks that have grown due to consolidation or inflation without increasing the risk to the banking system.**

**I am supportive of this proposal, but recommend that the threshold for requiring auditor attestation regarding internal controls over financial reporting should be raised to \$10 billion.**

**More banks than ever are subject to Part 363, making updates necessary to better match regulatory burden to risks.**

**The current Part 363 asset thresholds apply to more of the banking sector than ever before. In 1992 insured depository institutions (IDIs) above the \$500 million**

applicability represented roughly 7 percent of IDIs in the US and held approximately 75 percent of the banking system's assets. As of June 2025, IDIs above the \$500 million threshold represent make up 40 percent of banks and hold almost 98 percent to assets in the banking 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 to raise Part 363's applicability threshold. Since small banks are not responsible for the systemic risk concentrated within the nation's largest, most complex financial institutions, the proposal will achieve meaningful burden reduction without sacrificing safety and soundness or posing risk to the FDIC's Deposit Insurance Fund.

These thresholds have not been adjusted in decades and now capture many institutions that were never intended to be subject to such requirements.

The FDICIA requirement has increased over cost our \$275,000 in term of compliance cost, resources, Discuss the impact on your bank in terms of compliance costs, time, resources, and other burdens that outweigh the benefits of the requirements.

If FDIC consider the proposal than our resources could be better deployed to positively impact our customers or the community our banks serves.

We are recommending that the independent auditor attestation regarding internal controls over financial reporting be raised to \$10 billion rather than the proposed \$5 billion threshold.


A \$10 billion threshold would better align regulatory requirements with the realities of today's banking landscape and prevent institutions from being prematurely subjected to expensive compliance burdens that are intended to apply to large banks that pose significant risks to the financial system.

PointBank support indexing the thresholds so they will be updated automatically.

PointBank thank the FDIC for its efforts to modernize outdated thresholds, encourage the agency to identify and update other outdated thresholds that should be raised, and encourage the agency to conduct outreach with community bankers to assist in this effort.

Sincerely,

Harish Sethi  
EVP/CFO  
PointBank



[REDACTED]

[REDACTED]