



Raisin Solutions US, LLC | [REDACTED]

September 18, 2025

Jennifer Jones
Deputy Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Submitted via email (comments@fdic.gov)

Re: RIN 3064–ZA48 — Request for Information on Industrial Banks and Industrial Loan Companies and Their Parent Companies

Dear Ms. Jones:

Raisin appreciates the opportunity to comment on the FDIC’s Request for Information regarding industrial banks and industrial loan companies (the “RFI”). We welcome the FDIC’s effort to provide additional clarity and transparency around how the FDIC evaluates the statutory factors for filings involving the formation, acquisition or change in control of such depository institutions.

Raisin Solutions US LLC (“Raisin”) operates a consumer savings marketplace that connects U.S. consumers with FDIC-insured and NCUA-insured deposit products offered by a wide range of banks, some of which are industrial banks and industrial loan companies (“industrial banks”), and credit unions nationwide. Through Raisin.com, consumers can find, fund, and manage multiple savings products in one place without paying Raisin fees, while participating depository institutions retain full control over product terms and can efficiently reach a national audience for stable, granular retail deposits.

We support the continued availability of the industrial bank charter under the FDIC’s supervisory framework. Industrial banks are state-chartered, FDIC-supervised institutions subject to the same core restrictions, regulatory oversight, and safety-and-soundness examinations as other state nonmember banks. In addition, Part 354 requires written agreements—commonly including capital and liquidity maintenance commitments—tailored to industrial banks and their parents, providing the FDIC with appropriate tools calibrated to risk.

Moreover, an industrial bank charter enables responsible business models that would be impracticable if a parent had to be regulated as a bank holding company under the Bank Holding Company Act (the “BHCA”). Because industrial banks are excluded from the BHCA’s definition of a “bank”, qualifying parent companies can own an FDIC-insured depository without bank



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holding company status, allowing firms—including U.S. manufacturers—to deliver focused financial products (for example, financing that supports the sale of automobiles) while the subsidiary depository institution remains fully subject to FDIC bank-level supervision. We encourage the FDIC to maintain a clear path for such applicants, with conditions commensurate to risk.

With respect to safety and soundness, decades of quarterly FDIC Call Reports reflect that industrial banks have maintained strong capital, asset quality, and earnings—ranking among the safest and soundest institutions by many measures. Industrial banks operate under the same safeguards as other FDIC-supervised state nonmember banks, and the FDIC’s authorities—supplemented by Part 354—provide effective tools to oversee affiliates and require sources of strength where appropriate.

Industrial banks are also a source of innovation, delivering needed financial services to millions of American families and small businesses—including many who are underserved by traditional banking channels. The ability of industrial banks to specialize in particular products and customer segments expands access to affordable credit and attractive insured savings options, while preserving the safety and soundness expectations applied to all insured institutions.

We believe it is valuable for the FDIC to hear from a wide variety of stakeholders about the importance of industrial banks within the broader U.S. financial services fabric. Our experience working with institutions that use this charter aligns with the view that, when appropriately supervised and conditioned, industrial banks can responsibly enhance competition, resiliency, and consumer choice.

In sum, we support the FDIC’s thoughtful, case-by-case approach and the continued role of the industrial bank charter in safely expanding access to insured deposits and affordable credit. We stand ready to provide any additional data or perspective that may be helpful.

Respectfully submitted,

Cetin Duransoy

CEO, Raisin US
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