



August 8, 2025

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

Subject: Adjusting and Indexing Certain Regulatory Thresholds; Comment Request (RIN 3064-AG15)

To Whom It May Concern,

On behalf of River Bank (\$1B in Assets), I am writing to express our strong support for the FDIC's proposed changes to increase the asset threshold for requiring internal control audits under the Federal Deposit Insurance Corporation Improvement Act (FDICIA) Part 363 from \$1 billion to \$5 billion in assets.

As a community bank, we have experienced firsthand the significant burden associated with these audits. The current threshold imposes a substantial cost, both in terms of direct financial expense and indirect impacts on staffing and time. Our team is already lean, and the FDICIA internal control audit process demands countless hours from June through the following April. This time could be better spent on strategic initiatives, customer service, and enhancing risk management frameworks in a more tailored, efficient manner.

While we fully support the importance of strong internal controls and sound risk management, the level of audit rigor currently required is disproportionate for institutions of our size and complexity. The proposed threshold increase is a sensible and welcome change that will allow banks like ours to focus on innovation, community investment, and long-term planning rather than being consumed by compliance that, in many ways, offers diminishing returns at our scale.

Respectfully, we would like to request that the FDIC consider applying the proposed changes to the Federal Deposit Insurance Corporation Improvement Act (FDICIA) asset-size thresholds retroactively, effective as of January 1, 2025.

Implementing the revised threshold retroactively would help institutions align reporting and internal processes for the entire calendar year 2025, avoiding complications related to mid-year regulatory changes and help simplify year end planning.





River Bank

We believe this adjustment would be consistent with the FDIC's broader objectives of regulatory clarity, fairness, and supporting well-managed growth among institutions subject to FDICIA audit and reporting requirements.

We appreciate the FDIC's willingness to reconsider these requirements and respectfully urge the agency to move forward with the proposed changes.

Sincerely,



Brian Spreuer
CEO

