

September 16, 2025

Via Electronic Mail

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

Re: Establishment and Relocation of Branches and Offices (RIN 3064-AG10)

Ladies and Gentlemen:

Truist Bank ("Truist")¹ strongly supports the FDIC's proposed changes to revise its regulations in 12 CFR part 303 to amend the processes for a State nonmember bank to establish or relocate branches including by eliminating certain filing requirements, reducing processing timelines, and updating public notice procedures. The proposal acknowledges this impact by including common-sense changes to reduce the cost and regulatory burden for banks to establish and relocate branches. The proposed changes are beneficial and should be finalized as soon as practicable.

In addition to the proposed changes, we request the FDIC make an additional change to 12 CFR 303.45(c). Under that section, approval of an application expires after 18 months if the branch has not commenced business or the branch relocation has not been completed. Banks and the communities that they serve would benefit from extending that expiration date from 18 months to 36 months. Site planning, design, permitting, construction, and opening a branch generally takes longer than 18 months. As a result, banks wait until later in the branch opening lifecycle to request and obtain regulatory approval. By the time of the request for regulatory approval, banks have incurred substantial acquisition, site development, and construction costs. A 36-month approval expiration period would allow banks to seek regulatory approval significantly earlier in the process. This additional change is consistent with the FDIC's goals of

¹ Truist is a purpose-driven financial institution committed to inspiring and building better lives and communities, operating more than 1,900 branches across 17 states and the District of Columbia. Truist is a North Carolina-chartered State nonmember bank headquartered in Charlotte, North Carolina.

improving the certainty of, and reducing regulatory burdens associated with, these filing processes.

Truist appreciates the opportunity to engage with the FDIC on this proposal and for the FDIC's consideration of our comments. If you have any questions or would like to discuss our comments further, please contact Scott Tkacz, Senior Associate General Counsel, at

Sincerely,

Dontá Wilson Chief Consumer and Small Business Banking Officer