



September 16, 2025

VIA E-MAIL ONLY

Jennifer M. 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

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing nearly 180 state and nationally chartered banks, savings banks, and savings and loan associations of all sizes located in Wisconsin, their branches, and over 30,000 employees. WBA appreciates the opportunity to comment on the Federal Deposit Insurance Corporation's (FDIC) notice of proposed rulemaking regarding the establishment and relocation of branches and offices (proposal), which seeks to streamline and modernize the application process for these transactions.

WBA supports FDIC's efforts to reduce regulatory burden while maintaining appropriate supervisory oversight. The proposed changes reflect a reasonable and well-balanced approach, and the industry appreciates FDIC's inclusion of expedited processing timelines, simplified filing requirements, and clearer definitions that will benefit both banks and their customers. Similarly, WBA supports the simplification of filing content, such as reducing duplicative documentation and narrowing the scope of required information, which aligns with the principle of tailoring regulatory expectations to risk. In particular, the clarification of key terms such as "branch," "remote service unit," and "de minimis relocation" will help ensure consistent interpretation and application across institutions.

While WBA supports the overall direction of the proposal, we encourage FDIC to consider a few refinements to enhance clarity and implementation, as outlined below.

Public Notice and Customer Notification

First, the removal of the public notice and comment requirement for branch and office relocations represents a significant and positive change for banks. Historically, this process has added time and complexity without providing meaningful benefit to FDIC's evaluation of applications. FDIC's own data shows that public comments on branch applications are rare and often unrelated to the specific proposal, yet the requirement has delayed approvals and created uncertainty for banks seeking to respond quickly to business needs or community developments. Eliminating this step will allow banks to move forward more efficiently while still meeting all statutory obligations.

At the same time, WBA believes it is important for FDIC to provide clear guidance on what constitutes reasonable advance notice to customers. Under the proposed rule, FDIC would eliminate the longstanding public notice and comment period for branch and main office relocations and instead require banks to provide advance written notice directly to affected customers. This shift from a public-facing regulatory process to a customer-focused communication standard is a meaningful change. While WBA supports this approach as more practical and better aligned with customer needs, the proposal does not define what qualifies as



“reasonable” notice. Without further clarification, banks may face uncertainty regarding the timing, method, and scope of customer communications. For example, it is unclear whether notice must be provided a certain number of days in advance, whether electronic delivery is sufficient, or whether all customers of a branch must be notified regardless of their usage patterns. Clear expectations from FDIC would help ensure consistency across institutions and reduce compliance risk, while also supporting customer trust and continuity of service.

This need for clarity is especially important in the context of the proposed de minimis relocation exception. FDIC proposes to exempt certain minor address changes—such as moving a branch to a nearby suite in the same shopping center or across the street—from the formal filing process. These changes, while operationally minor, still require advance notice to both FDIC and customers. WBA supports the creation of this exception, which recognizes the limited supervisory value of processing filings for relocations within the same approximate location. However, because these moves may still impact customer access or expectations, it is essential that FDIC provide examples or parameters for what constitutes adequate customer notice in these scenarios. Doing so will help banks implement the rule effectively and ensure that customers remain informed and confident in their banking relationships.

Remote Service Units

Second, while WBA agrees with FDIC’s decision to exclude remote service units (RSUs) from the definition of “branch,” we believe additional clarification is necessary to help banks apply this definition consistently. The proposal defines an RSU as an automated or unstaffed facility operated by a customer with limited assistance from bank personnel, and includes devices such as automated teller machines, interactive teller machines (ITMs), drop boxes, and other electronic access points. This definition is intended to align with FDIC’s existing guidance and the Office of the Comptroller of the Currency’s regulations, and to reflect the reality that these facilities do not function as traditional branches. However, as technology continues to evolve, the line between RSUs and staffed service channels may become less clear. For example, ITMs can offer live video interaction with bank staff and perform core banking functions, raising questions about whether they should be treated as RSUs or branches. FDIC has previously issued guidance on this point, but WBA recommends that FDIC incorporate illustrative examples or FAQs into the final rule to help banks distinguish RSUs from other service models. Doing so would reduce uncertainty, support compliance, and ensure that banks can confidently deploy innovative service technologies without inadvertently triggering branch-related filing requirements.

Expedited Processing

Framework

WBA supports FDIC’s proposal to shorten expedited processing timelines and remove the agency’s discretion to pull qualifying applications from expedited review. These changes will provide banks with greater certainty and reduce delays. To ensure consistent implementation, WBA recommends that FDIC clarify what constitutes a “substantially complete” filing and confirm that acknowledgment letters will clearly state when the expedited timeline begins. Providing this clarity will help banks plan relocations and branch openings with confidence.

Eligibility Criteria

The proposal retains the current eligibility criteria for expedited processing, which WBA supports as appropriate and risk-based. However, we encourage FDIC to clarify how eligibility will be



determined in practice. For example, will eligibility be based solely on the most recent examination results, and how will pending or unresolved ratings or enforcement actions affect eligibility? Clear guidance on these points will help banks assess their status before filing and avoid unnecessary delays.

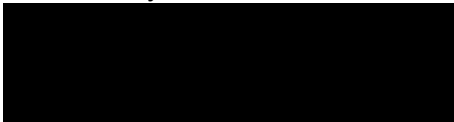
Main Office Relocations

WBA also supports the creation of a new expedited category for intrastate main office relocations for banks with a composite rating of 3 or better. This change reflects the limited supervisory risk associated with such moves. To promote consistency, WBA recommends that FDIC provide examples of what qualifies as an intrastate relocation and confirm that the same streamlined filing content requirements apply to these filings. This clarification will help banks understand expectations and take advantage of the efficiencies the proposal intends to provide.

Conclusion

WBA appreciates FDIC's continued efforts to improve regulatory efficiency and clarity. These proposed changes will help banks better serve their communities while maintaining appropriate oversight. We thank FDIC for its engagement with stakeholders and encourage finalization of the rule with the above recommendations in mind. WBA looks forward to continued dialogue with FDIC to ensure that these changes are implemented in a way that supports both regulatory efficiency and customer service.

Sincerely,



Rose Oswald Poels
President/CEO

