


From: [Ramon Morales](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] Adjusting and Indexing Certain Regulatory Thresholds; WBA Comment (RIN 3064-AG15)
Date: Friday, September 26, 2025 11:31:04 AM

Please find attached WBA Comments on Adjusting and Indexing Certain Regulatory Thresholds RIN 3064-AG15.

Thank you,



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The *WBA Directors Summit* is coming up on October 16!
Get the details and register for the event at wisbank.com/directors.



September 26, 2025

VIA E-MAIL ONLY

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

Re: Adjusting and Indexing Certain Regulatory Thresholds – RIN 3064–AG15

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing nearly 180 state and nationally chartered banks, savings and loan associations, and savings banks. WBA appreciates the opportunity to comment on the Federal Deposit Insurance Corporation's (FDIC) notice of proposed rulemaking to adjust and index certain regulatory thresholds (proposal).

WBA supports FDIC's efforts to modernize its regulations by updating long-standing dollar thresholds to reflect economic growth and by establishing an indexing methodology for future adjustments. The industry values a regulatory framework that remains appropriately calibrated to institutional size and risk profile. Without periodic adjustments, static thresholds can subject smaller institutions to requirements originally intended for larger, more complex organizations based on inflation alone rather than actual growth or risk.

WBA also supports FDIC's plan to apply an objective indexing methodology for future adjustments. However, we encourage FDIC to tailor its approach to the nature of each threshold. As discussed in greater detail within comments provided by the industry, we recommend that asset-based thresholds be indexed to nominal Gross Domestic Product (GDP) rather than the Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W). Nominal GDP better reflects the scale and structure of the banking sector and ensures that thresholds remain proportionate to the broader economy. For consumer-facing monetary thresholds, CPI-W remains an appropriate measure.

To further support regulatory efficiency and sustainable growth, WBA encourages FDIC to consider transition relief for institutions that recently crossed a threshold or are approaching one. Applying revised thresholds retroactively and allowing sufficient time for compliance would help mitigate cliff effects and avoid unnecessary burden from short-term fluctuations.

Finally, WBA supports FDIC's broader effort to modernize outdated thresholds and encourages continued interagency coordination and legislative engagement to ensure consistency across the regulatory framework. Maintaining thresholds that reflect current economic realities will enhance regulatory efficiency and ensure that supervisory expectations remain aligned with actual risk.

Thank you for the opportunity to provide comments on this important proposal. WBA looks forward to continued engagement with FDIC to support a balanced regulatory framework for Wisconsin's banking industry.

Sincerely,

[Redacted Signature]
Rose Oswald Poels
President/CEO
[Redacted Contact Information]