



Subject: Comment Request– RIN 3064-AF99

Dear Mr. Sheesley,

My name is Scott Nistico and I am writing to express my opposition to the FDIC's proposed changes to the rules on brokered deposits. As the owner of a small security firm in Philadelphia that provides safety personnel to local restaurants, bars, and other establishments, I am deeply concerned that these changes would negatively impact both my business and the broader community we serve. Operating in a city where safety services are increasingly vital, I rely heavily on consistent access to funds from community banks to manage payroll, training, and equipment costs for my staff. Any changes that could disrupt the stability of financing available to small businesses would place unnecessary strain on businesses like mine, which contribute to public safety.

The current regulations have provided much-needed flexibility for community banks, allowing them to extend financing options to small businesses at more competitive rates. For small security firms like mine, which do not have the financial leverage of larger companies, local banks are essential. Their support enables me to maintain a full roster of trained personnel and cover essential expenses. Without access to reasonably priced financing, many small firms, especially those in service sectors such as security, would face severe challenges in maintaining staffing levels and service quality, impacting both local businesses and public safety.

Restricting partnerships with modern third-party platforms will reduce the capacity of community banks to serve local businesses, increasing costs or limiting access to crucial funds. My firm, like many other small businesses, already operates on slim margins, and any reduction in affordable banking options could force us to cut back on services and staffing. These cuts would leave a gap in the safety infrastructure of the Philadelphia community, affecting both our clients and their patrons.

I respectfully urge the FDIC to consider the real-world impact of these rule changes on small businesses and the communities they support. The existing rules have allowed local banks to serve as reliable financial partners for companies like mine, facilitating stable business operations and reinforcing community trust. Altering this framework would jeopardize these vital

relationships, potentially undermining public safety and weakening the financial health of small businesses.

Thank you for considering the perspective of small business owners and the potential consequences of this rule to local economies.

Sincerely,

Scott Nistico  
Managing Director  
Grayman, LLC