January 28, 2016

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429

Regarding: Notice of Proposed Rulemaking and request for comments RIN 3064-AE37

Dear Mr. Feldman:

American Bank Center welcomes the opportunity to comment on the Federal Deposit Insurance Corporation's ("FDIC") Notice of Proposed Rulemaking ("NPR") to amend 12 CFR Part 327 to refine the deposit insurance assessment system for small depository institutions ($10 billion in assets and under) that have been federally insured for at least five years.

The Federal Deposit Insurance Act ("FDI Act") requires the FDIC Board of Directors to establish a risk-based deposit insurance assessment system for small depository institutions to more accurately reflect risk. We fully understand it is the intent of the FDIC to incorporate lessons learned from the recent financial crisis into this new and modernized proposal to better differentiate riskier banks from safer banks. It is appropriate in our opinion that riskier activities would result in a higher assessment. Less risky banks have subsidized the Deposit Insurance Fund ("DIF") throughout the financial crisis. We have not had a claim against the FDIC since the inception of this Community Bank.

The FDIC as well as the DIF is of great value to the strength of our company, the economy and the country. The original purpose of the federal insurance program was to instill greater public confidence in the safety of money deposited in banks. This has allowed the Community Bank to lend those funds to consumers within our local economy.

We have tested the proposed formula and note that we are one of the banks that will not be affected positively or negatively in the immediate future.

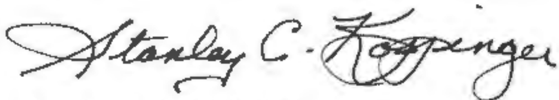
The formula appears to reward actual well run banks as evidenced by the quality of their loan portfolio, the size of the growth within the loan portfolio and the quality of the management doing so. It indicates a natural bias toward safety and soundness within the model.

The 'minimum' rate does not price to risk. Perhaps consideration should be given within the model for banks that year over year are strong and well managed. The 'drift' to a minimum penalizes strong performance. In effect, banks that are under the minimum subsidize those that have riskier activities.

Will risk based examinations soon follow a more fundamental risk based assessment? We certainly would expect a stepped up examination schedule if an institution is risk rated 3, 4 or 5. Would the resources of time and talent be better allocated for both the FDIC and the banks with strong CAMELS components year over year? May I suggest banks that are well capitalized, have strong earnings, strong asset quality, well managed coverage ratio and an overall strong management team not necessarily be on an annual cycle of examination. We always welcome the examination teams. The time spent provides value to us. But at a time when more is expected of our staff relative to regulatory requirements and continued earnings performance, it's a challenge to balance all that with an examination. We certainly support the examination process. Banks with strong policies and procedures typically need less oversight than those without strong policy and procedure.

I would like to thank you for the opportunity to share comments.

Respectfully submitted,



Stanley C. Koppinger
President and CEO
American Bank Center
Dickinson, ND 58601
701-483-7514 (direct)