

I would like to offer a comment on the Interagency Policy Statement on Allowances for Credit Losses. As a new bank, the implementation of CECL is quite challenging as we have not had any loan charge offs since the Bank opened 6 years ago and we do not have any true peers. We continue to research the methods and compare the pros and cons but would like consideration to be given to institutions in our situation. I also am concerned about the comparability of the Allowance calculation once all institutions implement this standard. Since there are so many methods that can be used and each method can give varying results, it appears that the investor may have a tough time comparing one institution to another.

Thank you!

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<https://www.regulations.gov/document?D=OCC-2019-0013-0004>