

May 25, 2022

James P. Sheesley, Assistant Executive Secretary  
Attn Comments- RIN 3061ZA32  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street NW, Washington, DC 20429

In response to the FDIC's request for comment on its statement of principles for climate related financial risk management for large financial institutions, I am submitting this letter to outline Grand Savings Bank view of such intended rules and regulations. Grand Savings Bank is a market leader in Delaware County, Oklahoma and operates thirteen branches located in Northeast Oklahoma and Northwest Arkansas. Grand Savings Bank is a \$780 million Community Bank that has served its communities for over 30 years and has provided continuity to operations and customer service through our risk management policies and practices.

Climate related risks are events that we prepare for on a continual basis with contingency backup plans to serve our communities in the aftermath of any event. I am the CEO of Grand Savings Bank and feel that the proposed framework for managing climate related financial risk management for large banks will negatively impact our bank and our community since such rules will be applied to Community Banks at some point in time. Community Bankers have been monitoring risks for years which includes the climate element within the risk profile; however, creating a new initiative with political overtones does not serve a community bank with additional expense and bureaucracy when such risk is already monitored.

Please consider our response to item D *Current Risk Management Practices* and questions 5-10: In our community bank, we may be faced with hiring qualified experts to perform scenario analysis as there are few individuals located in our community who could perform this work. The burden on our staff and customers to gather climate data could be overwhelming to complete the analysis. Banks of all sizes will continue to apply traditional credit and financial risk tolerances and parameters to their balance sheets to manage their risks and support the customers and communities they serve.

In addition, banks are navigating enterprise risk management, third party risk management and assessments, information technology risk and cybersecurity risk which are addressed at least annually and more frequently as changes in processes dictate. These are areas that community banks need to focus on.

I would like to thank the FDIC for the opportunity to submit comments on the proposed framework. Community Banks support working America in our local communities and we would like to discourage creating new bureaucracy that repackages our current risk profiles and monitoring for the sake of being popular with the current buzz word of "Climate".

Sincerely,



Guy J. Cable  
CEO