



July 18, 2023

Mr. James P. Sheesley
Assistant Executive Secretary
Attention: Comments—RIN 3064-AF93
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Dear Mr. Sheesley:


Thank you for the opportunity to respond to the FDIC's request for comment on special assessments following the systemic risk determinations announced after the failures of Silicon Valley Bank and Signature Bank. ANB Bank is a \$3.16 billion community bank headquartered in Denver, Colorado with locations throughout the state of Colorado, along with several communities in Wyoming. We operate a low-to-moderate risk profile bank, with a focus on knowing and providing value to core customers.

ANB Bank strongly supports the FDIC's proposal to exempt the first \$5 billion in uninsured deposits from the pending special assessment. This proposal provides an equitable solution for all banks by exempting the first \$5 billion in uninsured deposits and rebuilds the Deposit Insurance Fund primarily through those larger banks that operate with more of a reliance on uninsured deposits, an inherently riskier bank model. By basing the assessment on the amount of uninsured deposits at an organization, the Deposit Insurance Fund is being replenished by organizations that maintained depositor profiles more similar to the banks that required the recent use of the Deposit Insurance Fund.

In summary, the proposed \$5 billion exemption is a carefully crafted solution that fairly rebuilds the recent losses in the Deposit Insurance Fund by targeting higher risk profiles and does not penalize community banks.

Thank you for the opportunity to provide comments on the proposed special assessments.

Sincerely,



Koger L. Propst
President & CEO

