



July 19, 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:

I am submitting this letter in response 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 of New York.

On behalf of our 54 member banks, I write briefly to applaud the FDIC's decision to exempt community banks with fewer than \$5 billion in assets from paying any special assessment for the large bank failures of SVB and SBNY, and I encourage the FDIC to finalize its rule as proposed.

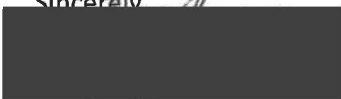
Our members are found in every corner of the Commonwealth, in rural, urban, and suburban settings. They provide a wide range of essential financial services, focused on taking local deposits and providing consumer, mortgage, small business, and agricultural loans. All but one of our 54 member banks are below the threshold proposed for the exemption.

We are pleased that the proposal applies the special assessments to the types of banking organizations that benefitted most from the FDIC's protection of uninsured depositors at SVB and SBNY. We agree that large banks with large amounts of uninsured deposits benefitted the most from the systemic risk determination. Our banks are not concentrated in uninsured deposits and operate under a safer and much more sound business model.

Our member banks are challenged to keep up with costs of all kinds, including the technology to respond to customer desires and the ability to safeguard their information and funds. Maintaining a talented workforce is necessary, challenging and costly. And current margins don't allow much room for absorbing additional costs, especially when the costs are driven by undisciplined actions of others, beyond their control. This exemption will spare our members from one additional challenge.

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

Sincerely,



Steven C. Yeakel, CAE
President & CEO

The Satterfield Center for Community Banking in Virginia

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