



July 20, 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;

As the Chairman of State Bank Northwest, a \$220 million asset community bank in Eastern Washington, we support the FDIC's proposal to exempt community banks under \$5 billion from the DIC Special Assessment.

Our bank has been in existence since 1902 and survived many crises in the financial industry and we have continued our "vanilla model" of community banking. 100% local loans funded with 100% local deposits (no borrowings, brokered funds, etc....). We are relationship based and look nothing like the recent bank failures resulting in the substantial losses to the DIF.

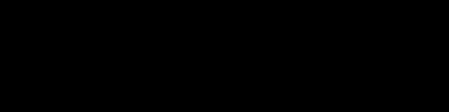
However, when politicians and the media lump all "banks" together, it is sometimes difficult for the members of our community to understand the difference between local community banks, regional banks, or the large Too Big to Fail Institutions. So, the impact of this crisis is felt by all.

I commend the FDIC for recognizing the difference in small, non-complex community banks that did not cause this crisis, nor the great industry crisis in 2010. While the business models of these "regional" bank greatly differ and the reasons for their failure are varied, it still reminds me a lot of the S&L crisis in the early 80's - poor ALCO management, lending long, and borrowing short. We model this risk every single month at our board meetings and our bank has the least amount of exposure to AOCI of all banks in Washington State.

Thank you for the consideration of tailoring the DIF assessment and I appreciate your ongoing efforts to tailor regulation and supervision to the size, scope, and complexity of each individual bank.

Thank you for the opportunity to comment on the proposed rule. I strongly support the FDIC's proposal to limit the special assessment to the largest banks and encourage you to finalize the rule as proposed.

Respectfully,


Gregory S. Deckard
CEO/Chairman
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