



# COPIAH BANK

"Make Our Bank Your Bank"® FDIC

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September 3, 2015

Mr. Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

RE: FDIC Notice of Proposed Rulemaking  
RIN 3064-AE37

Dear Mr. Feldman:

We welcome the opportunity to comment on the FDIC Notice proposing changes to the insurance assessment regulation for small banks and its treatment of reciprocal deposits. These deposits are stable, dependable sources of core funding that do not present the risks and other characteristics of traditional brokered deposits. Reciprocal deposits are not just another form of wholesale funding and should not be treated as such.

As the FDIC's proposal points out, the premium assessment for an institution is supposed to reflect the risks posed by its assets and liabilities. Those risks must be specific and measurable. We do not feel that reciprocal deposits pose any additional risk in the manner that traditional brokered deposits do: instability, high costs, promoting rapid growth, etc. Our reciprocal deposits come from local customers who usually have long-term, dependable relationships with our bank. They provide a means to serve our core customers and therefore add to franchise stability and value. We think it very unfair to lump reciprocal deposits in with traditional brokered deposits in the FDIC proposal.

Please reconsider this proposal as presented and remove reciprocal deposits from the definition of "brokered" for assessment purposes. In addition, we urge the FDIC to specifically exempt reciprocal deposits from the definition of brokered deposits in the Federal Deposit Insurance Act.

Thank you for this opportunity to comment on this proposal.

Sincerely,

Alford M. Cooley  
Executive Vice President and Chief Financial Officer