



September 11, 2015

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

Re: Federal Deposit Insurance Corporation Notice of Proposed Rulemaking,  
RIN 3064-AE37 ("the Notice")

Dear Mr. Feldman:

On July 13, 2015, the Federal Deposit Insurance Corporation (FDIC) published for comment a Notice of Proposed Rulemaking (NPR) proposing changes to its deposit insurance assessment regulation for small banks, which were defined as banks having assets of less than \$10 billion.

I am writing on behalf of the members of the Louisiana Bankers Association. Of the 135 FDIC-insured institutions domiciled here, 59 offer reciprocal deposits to their customers. These banks rely on reciprocal deposits as a stable source of cost-effective funding.

The Louisiana Bankers Association believes the FDIC should continue to treat reciprocal deposits as it does under the current system, which is to say excluding reciprocal deposits from the category of brokered deposits for assessment purposes. If the proposal were to go into effect as written, reciprocal deposits would be treated as brokered and banks holding reciprocal deposits would have to pay premiums higher than would otherwise be the case.

We further believe banks rated CAMELS I or II by supervisors should not be subject to a base rate as high as 16 bases points once the FDIC fund reaches 1.15 percent.

We further believe the proposed loan portfolio distribution factor should be very cautiously studied for unintended consequences it may have.

Lastly, Louisiana community banking has performed remarkably well and believes the protection of the FDIC insurance fund is of the highest priority. The focus on safety and soundness and the fund are part of Louisiana bankers DNA. Caution and unintended consequences are what we suggest be considered very thoughtfully on any final rule.

Sincerely,

Robert Taylor  
Chief Executive Officer  
Louisiana Bankers Association