



August 28, 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)

Dear Mr. Feldman:

On behalf of First Freedom Bank, I want to thank you for the opportunity to comment on the Federal Deposit Insurance Corporation (FDIC) Notice of Proposed Rulemaking (NPR) proposing changes to the FDIC's deposit insurance assessment regulation for small banks, which are defined as banks with assets of less than \$10 billion. In particular, we would like to comment on the impact of this proposal in regard to reciprocal deposits.

First Freedom Bank is headquartered in Lebanon, Tennessee. We have \$312 million in assets held at three branches in our county. We have utilized the program since 2008 exclusively in conjunction with our county Trustee's deposits. This has allowed us to service this important local governmental department without sacrificing liquidity. Thus, the bank is able to lower its operating risk, which is beneficial to our customers, our shareholders, and the FDIC itself. This account ranks near the top of our entire customer base in terms of consistency and longevity. The reciprocal deposit program is critical to maintaining this account at a price point that benefits our local community.

The proposed Federal Deposit Act specifically calls for a risk-based assessment system "for calculating an insured depository institution's assessment based on the insured depository institution's probability of causing a loss to the DIF due to the composition and concentration of the IDI's assets and liabilities...." In short, the premium assessments for each individual institution are supposed to reflect the specific and measurable risks posed by its assets and liabilities.

The proposal also states that it would improve the current system "by incorporating newer data from the recent financial crisis" ... to ... "more accurately reflect risk."

When it established the current system in 2009, the FDIC recognized that reciprocal deposits “may be a more stable source of funding for healthy banks than other types of brokered deposits and that they may not be as readily used to fund rapid asset growth.”

That recognition was based on the characteristics that reciprocal deposits share with core deposits, characteristics that traditional brokered deposits lack. In particular, reciprocal deposits typically come from a bank’s local customers and the relationship the bank has with the customer is long-term and includes multiple services. The bank sets the interest rate based on local market conditions. The deposits add to a bank’s franchise value. Reciprocal deposits, therefore, do not present any of the concerns that traditional brokered deposits do: instability, risk of rapid asset growth, and high cost.

Specifically, under the current system, reciprocal deposits are excluded from the “adjusted brokered deposit ratio” which penalizes banks for reliance on brokered deposits. The proposed assessment system would no longer exclude reciprocal deposits from the definition of brokered deposits.

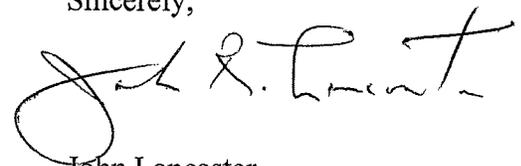
In the proposal, the FDIC gives no justification for this shift, which would result in reciprocal deposits being treated like any other form of brokered deposit or wholesale funding. It simply and arbitrarily lumps reciprocal deposits in with traditional brokered deposits. In doing so, it would penalize banks that use them by, in effect, taxing them.

A solution is simple: retain the current system’s exclusion of reciprocal deposits from the definition of “brokered” for assessment purposes.

Further, we strongly urge the FDIC to support legislation to explicitly exempt reciprocal deposits from the definition of brokered deposit in the FDI Act.

Thank you for the opportunity to comment on this proposal.

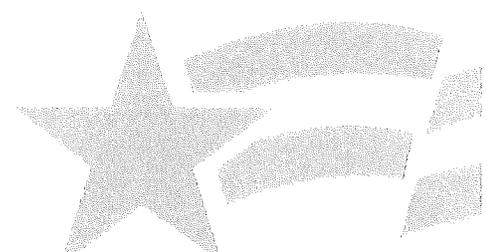
Sincerely,



John Lancaster  
President & CEO

cc:

The Honorable Lamar Alexander  
455 Dirksen Senate Office Building  
United States Senate  
Washington, D.C. 20510



The Honorable Bob Corker  
425 Dirksen Senate Office Building  
United States Senate  
Washington, D.C. 20510

The Honorable Diane Black  
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The Honorable Martin J. Gruenberg  
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