

From: [DALE JOHNSON](#)
To: [Comments](#)
Cc: [RICK WARDLAW](#); [MACKE MAULDIN](#)
Subject: Bank Independent, Sheffield, AI FDIC #16604 Comments to FDIC Proposal to Revise Premium Assessments for Banks under \$10 Billion
Date: Friday, September 11, 2015 11:26:53 AM

Rick Wardlaw, EVP/CFO, and I have reviewed the proposal to revise the premium assessment and feel that this proposal would be a fair calculation. First of all, we agree banks that pose a higher risk to the banking system and depositor should pay a higher FDIC premium. We also feel that any attempt to provide predictive risk assessment factors to the FDIC premium will be an improvement in determining the assessment rate for banks. We do realize that it is a challenge to identify today's risk factors rather than relying on yesterday's risk factors, however, we do feel that the variables included in the proposed formula do help measure these risks. We appreciate that all new data used in the proposed calculation is already being reported and there will not be any additional burden of collecting data to the banks.

Thank you for the opportunity to respond to the proposal.

Sincerely,

Dale Johnson
Vice President & Comptroller
Accounting Department
{O} 256.386.5123
{F} 256.260.1131
www.bibank.com

This email and any files or links transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If the reader of this message is not the intended recipient, then you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this email in error please notify Bank Independent at 256-386-5000, toll free at 1-877-865-5050 or customerservice@bibank.com. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the bank. Finally, the recipient should check this email and any attachments for the presence of viruses. The bank accepts no liability for any damage caused by any virus transmitted by this email.