

William A. Loving, Jr., CLBB  
President & CEO



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August 07, 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:

Pendleton Community Bank, Inc. is headquartered in Franklin, WV. We have \$265,076,000 in assets and 5 branches. We are part of a reciprocal deposit placement network, and we have found reciprocal deposits to be an important source of funding.

We welcome 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. In particular, we would like to comment on how this proposal would affect reciprocal deposits.

In short, we strongly urge the FDIC to continue to separate the treatment of reciprocal deposits from that of traditional brokered deposits in setting assessments. Reciprocal deposits are stable sources of core funding that do not present the risks and other characteristics of traditional brokered deposits. The separate treatment of reciprocal deposits from that of traditional brokered deposits in the current assessment system recognizes the differences between the two types of deposits. Reciprocal deposits are not just another form of wholesale funding and should not be treated as such.

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." Nothing has changed since then. Traditional brokered deposits are "hot"; reciprocal deposits are not.

Further, as the FDIC's proposal itself 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 should be measurable.

**Franklin**  
P.O. Box 487  
300 N. Main Street,  
Franklin, WV 26807  
Phone (304) 358-2311  
Fax (304) 358-7997

**Marlinton**  
P.O. Box 87  
900 N. Seneca Trail,  
Marlinton, WV 24954  
Phone (304) 799-6700  
Fax (304) 799-6310

**Moorefield**  
P.O. Box 651  
402 S. Main Street,  
Moorefield, WV 26836  
Phone (304) 538-7900  
Fax (304) 538-7899

**Petersburg**  
102 Virginia Avenue  
Petersburg, WV 26847  
Phone (304) 257-4000  
Fax (304) 257-4006

**Harrisonburg**  
P.O. Box 2008  
Harrisonburg, VA 22801  
41 Monte Vista Dr.,  
Harrisonburg, VA 22802  
Phone (540) 434-4722  
Fax (540) 434-9329

Reciprocal deposits do not present any of the risks and concerns that traditional brokered deposits do: instability, risk of rapid asset growth, and high cost. On the contrary, our reciprocal deposits come from local customers. We typically have a relationship with our customers that goes far beyond merely accepting their deposits. We set reciprocal deposit interest rates based on local rates. Our experience is that reciprocal deposits “stick” with the bank. For all these reasons, they add to our bank’s franchise value.

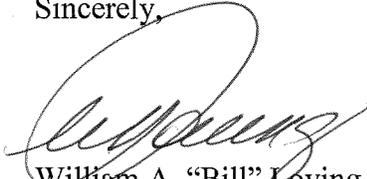
The FDIC in its proposal gives no justification for treating reciprocal deposits like traditional brokered deposit: no facts, no figures, no analysis. Rather, it arbitrarily lumps the two together. In doing so, it would penalize banks that use them by, in effect, taxing them. Such a tax would be unnecessary and unfair. The FDIC’s proposal would punish our bank for using one of the few tools we have to compete against the mega-banks.

Again, we strongly urge you to retain the current system’s exclusion of reciprocal deposits from the definition of “brokered” for assessment purposes.

So that we do not have to revisit this issue later, we also strongly urge the FDIC to support legislation to explicitly exempt reciprocal deposits from the definition of brokered deposit in the Federal Deposit Insurance Act.

Thank you.

Sincerely,



William A. “Bill” Loving, Jr., CLBB  
President & CEO

cc: The Honorable Joe Manchin  
306 Hart Senate Office Building  
United States Senate  
Washington, D.C. 20510

The Honorable Shelley Capito  
172 Russell Senate Office Building  
United States Senate  
Washington, D.C. 20510

The Honorable Alex Mooney  
1232 Longworth House Office Building  
United States House of Representatives  
Washington, D.C. 20515

The Honorable Martin J. Gruenberg  
Chairman  
Federal Deposit Insurance Corporation  
550 17th St., NW  
Washington, DC 20429