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December 7, 2015

Mr. Gary Kuiper
Counsel, Legal Division
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: FDIC Small Business Lending Survey

Dear Ladies and Gentlemen:

The Independent Community Bankers of America (ICBA)¹ appreciates the opportunity to provide comment on the Federal Deposit Insurance Corporation's (FDIC) proposed small business lending survey. ICBA supports the FDIC's desire to highlight the importance of small businesses in the economy and the role that community banks play in supporting small businesses. ICBA has long believed that community banks, which in many cases are themselves small closely held businesses, are vital to providing small business credit opportunities throughout the country. By providing community banks the opportunity to reflect on their small business lending products offered to customers, ICBA believes that the FDIC will gain a better understanding of the vital role community banks play in strengthening communities and how these institutions can be preserved. With this new understanding, ICBA hopes that this survey will demonstrate the need for extensive community bank regulatory relief so that they may continue to provide high quality small business lending solutions to their customers.

ICBA believes that the FDIC could improve the survey experience for solicited depository institutions by paying more attention to the difficulty involved in a community financial institution accessing the source data needed across the bank to properly complete the survey in a reasonable amount of time without undue hardship for the organization. For example, ICBA notes that the FDIC has estimated that the average time needed per response is four hours. Based on our communication with community

¹ The Independent Community Bankers of America®, the nation's voice for more than 6,000 community banks of all sizes and charter types, is dedicated exclusively to representing the interests of the community banking industry and its membership through effective advocacy, best-in-class education and high-quality products and services.

With 52,000 locations nationwide, community banks employ 700,000 Americans, hold \$3.6 trillion in assets, \$2.9 trillion in deposits, and \$2.4 trillion in loans to consumers, small businesses, and the agricultural community. For more information, visit ICBA's website at www.icba.org.

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bankers on the difficulty in providing meaningful responses, we estimate that the time needed to complete the survey will be much greater, in some cases requiring multiple days of generating data queries to answer the questions accurately. These banks also noted that an effective response in some cases would require the utilization of multiple staff members from different departments of the bank in order to gather the required data. None of the bankers we have spoken with felt that the survey could be completed in the estimated four hour timeframe.

ICBA recommends that the FDIC consider ways to streamline the survey and thus reduce the burden associated with providing the information requested. We note that the agency estimates that approximately 2,000 banks will respond to the survey. While that estimate may be unrealistic for long and complex queries, we believe a more streamlined survey would significantly improve the overall response rate. ICBA also recommends that the agency consider conducting onsite visits with community banks to discuss their small business lending activities in order to better assess how these institutions serve the needs of their small business customers. The agency could also reduce the number of questions and the complexity of the information requested in order to reduce the overall burden that would otherwise be placed on these institutions.

ICBA appreciates the opportunity to comment on this proposal. If you have any questions or would like additional information, please do not hesitate to contact me at james.kendrick@icba.org or (202) 659-8111.

Sincerely,

/s/

James Kendrick
Vice President, Accounting & Capital Policy

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