

November 20, 2018

Submitted Electronically

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

Re: Disclosure of Financial and Other Information by FDIC-Insured State Nonmember Banks
RIN 3064–AE65

Dear Mr. Feldman:

The American Bankers Association (ABA)¹ appreciates the opportunity to comment on the Federal Deposit Insurance Corporation's (FDIC) Notice of Proposed Rulemaking RIN 3064–AE65: Disclosure of Financial and Other Information by FDIC-Insured State Nonmember Banks (the Proposal). The Proposal rescinds and removes regulations relating to certain disclosures of financial and other information by FDIC-insured state nonmember banks. The ABA supports the FDIC's efforts to simplify regulations and remove unnecessary or redundant regulations.

With respect to the specific changes articulated in the proposal, the ABA agrees with the FDIC's conclusion that 12 CFR part 350 is unnecessary due to the wide spread public availability of the information through other means including the FDIC's website. For example, the information required in part 350 is already available online through Call Reports and the Uniform Business Performance Report. Therefore, the ABA fully supports this proposal and would like to thank the FDIC for its efforts in removing this unnecessary regulation.

If you have any questions about these comments, please contact me at (202) 663-5318 or through email at jstein@aba.com.

Sincerely,



Joshua Stein

¹ The American Bankers Association is the voice of the nation's \$17 trillion banking industry, which is composed of small, regional and large banks that together employ more than 2 million people, safeguard \$13 trillion in deposits and extend more than \$9 trillion in loans.