



**International Bancshares
Corporation**

August 5, 2019

Via email: comments@fdic.gov

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

Re: RIN 3064-ZA06
*Request for Information on FDIC Technical Assistance Offerings and
Delivery*

Dear Mr. Feldman:

The following comments are submitted by International Bancshares Corporation (“IBC”), a multi-bank financial holding company headquartered in Laredo, Texas. IBC maintains over 189 facilities and more than 286 ATMs, serving 89 communities in Texas and Oklahoma. With over \$12.0 billion in total consolidated assets, IBC is one of the largest independent commercial bank holding companies headquartered in Texas. IBC is a publicly-traded financial holding company.

This letter responds to the FDIC’s request for information and comment regarding its technical-assistance offerings and additional steps the FDIC could take to increase the level and effectiveness of technical assistance it provides to the banking industry. Our experience with FDIC technical assistance has been very positive, due in large part to the collaborative approach that the FDIC and its staff bring to these interactions. We strongly support the FDIC’s technical-assistance program and encourage the FDIC to continue to invest in these efforts to help strengthen institutions’ risk-management and compliance programs.

Technical Assistance Videos

We have found the technical-assistance videos to be arranged in a user-friendly manner. The short, discrete nature of the clips makes it easy to obtain guidance regarding a specific item without having to watch a lengthy video to locate relevant information. However, the audio is dry and monotone, and the videos have a very dated look and feel.

Directors’ Resource Center

We support the FDIC’s move to organizing the resource center by topic rather than product type. This will promote the development of greater subject-matter

expertise by providing one place for bank staff to refer to for comprehensive guidance in a particular area. However, like the technical-assistance videos, the Directors' Resource Center videos feel outdated and the audio is not engaging.

Teleconferences and Webinars

The teleconferences and webinars we have attended are highly scripted. We would prefer a more interactive format that allowed for discussion and Q&A. We support archiving audio and video from the webinars on the FDIC's website as a reference tool for bank staff looking for further guidance regarding a topic.

Regional Compliance Newsletters

We find the regional compliance newsletters very useful and well written. They help banks understand emerging issues the FDIC is noticing across the industry, which allows institutions to address potential issues or areas of concern in real time rather than await feedback at the next examination.

Individual Assistance to Institutions

As an FDIC Minority Depository Institution, IBC is extended an offer of technical assistance by FDIC examiners. Our interactive sessions with FDIC specialists and subject-matter experts have been especially beneficial. We have found these meetings invaluable for learning best practices and better understanding regulatory expectations, particularly regarding Fair Lending. The examiners from the Dallas office went above and beyond in providing assistance in this area, and we greatly appreciate it. The feedback provided in the interactive sessions enables our compliance and risk-management leaders to share important insights with their teams and refine key processes and procedures. Our staff has remarked how generous the FDIC professionals have been with their time in these sessions.

Today's regulatory landscape is challenging to navigate, particularly for community banks that lack the resources to build out enormous compliance and risk-management structures like major national banks. The FDIC's technical-assistance program is an important tool for promoting safety and soundness in our industry. We appreciate the FDIC's continued support of community banks' efforts to strengthen their compliance and risk-management practices.

Thank you for this opportunity to share our views.

INTERNATIONAL BANCSHARES CORPORATION



Dennis E. Nixon
President & CEO