

From: Dan Wilcoxon <dwilcoxon@ucbbank.com>
Sent: Friday, October 23, 2020 11:31 AM
To: Comments
Subject: [EXTERNAL MESSAGE] October 23, 2020 - Applicability of Annual Independent Audits and Reporting Requirements for Fiscal Years Ending in 2021; Interim final rule; Comment Request (RIN 3064-AF63)

This IFR does a nice job of providing relief from the compliance requirements of Part 363 of the FDIC Regulation for institutions with artificially high asset totals due to stimulus programs associated with COVID-19. As I read through the materials, I do not see that this IFR addresses or even makes mention of the Expanded Examination Cycle for Certain Small Insured Depository Institutions introduced by FIL-45-2018. As a well-capitalized and well-managed institution between \$1 billion and \$3 billion, we have experienced the benefits of the 18 month examination cycle afforded by FIL-45-2018; however, significant growth related to COVID-19 threatens our ability to maintain assets below the \$3 billion mark. We would appreciate you giving consideration to an expansion of the scope of this IFR so that it may not only provide temporary relief from the requirements of Part 363 of the FDIC Regulation, but that it may also allow us to retain our expanded examination cycle during this time of inflated assets throughout the banking system driven by COVID-19 stimulus.

Thank you for your consideration,
Dan

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