

From: Tina Marbury <Tina.Marbury@abtgold.com>
Sent: Tuesday, May 19, 2020 11:07 AM
To: Comments
Subject: [EXTERNAL MESSAGE] RIN 3064- AF53

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Dear Sir or Madam,

I wish to comment on **RIN 3064-AF53 - Assessments, Mitigating the Deposit Insurance Assessment Effect of Participation in the Paycheck Protection Program (PPP), the PPP Lending Facility, and the Money Market Mutual Fund Liquidity Facility**

This proposed rule could potentially be unfair to IDI's that hold PPP loans but do not pledge them as collateral in the PPPLF. As written, it would allow IDI's that do not participate in the PPPLF or MMMLF to exclude PPP loans in certain measures used to calculate the assessment rate (such as the loan mix). However it would not allow them to exclude the PPP loans from total assets or average total consolidated assets, as would be done for IDI's that pledged loans to the PPPLF or MMMLF.

I ask that you consider revising the proposed rule to allow IDI's to exclude PPP loans from total assets and average total consolidated assets regardless of whether the IDI participates in the PPPLF or MMMLF.

Thank you,

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