



February 28, 2020

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

Re: *Request for Information on FDIC Sign and Advertising Requirements and Potential Technological Solutions (RIN 3064-ZA14)*

Dear Mr. Feldman:

The American Bankers Association, Bank Policy Institute, and Independent Community Bankers of America appreciate the opportunity to provide comments on the FDIC's Request for Information (RFI) on FDIC sign and advertising requirements and potential technological solutions. The FDIC has noted that it is seeking input to modernize these rules to reflect that the channels for deposit-taking have evolved significantly since the FDIC last updated these rules in 2006. The FDIC also seeks input on how to address misrepresentations by nonbanks about deposit insurance.

We support the FDIC's efforts to modernize these requirements, but believe that the short comment period, which closes on March 19, 2020, makes it difficult to gather member input to provide an adequate response to the questions listed in this RFI. The current deadline affords interested parties only 30 days to respond from the day this RFI was announced, which is less than 30 days from this RFI's publication in the *Federal Register* on February 26, 2020.

Accordingly, we respectfully ask that the FDIC extend this comment period by 60 days to allow the banking industry and other interested parties sufficient time to offer more considered feedback.

Sincerely,

Shaun Kern
Senior Counsel
American Bankers
Association

Naeha Prakash
Associate General Counsel
& Senior Vice President
Bank Policy Institute

Christopher Cole
Executive Vice President &
Senior Regulatory Counsel
Independent Community
Bankers of America