

December 21, 2015

Federal Deposit Insurance Corporation  
550 17th Street N.W.  
Washington, DC 20429-9990

Re: FIL-51-2015 – Frequently Asked Questions Regarding Identifying, Accepting and Reporting Brokered Deposits

Ladies and Gentlemen:

Promontory Interfinancial Network (“PIN”) is keenly interested in the Federal Deposit Insurance Corporation’s (“FDIC”) Frequently Asked Questions Regarding Identifying, Accepting and Reporting Brokered Deposits (“FAQs”), initially issued in January 2015 through FIL-2-2015 and re-issued for comment on November 13, 2015 through FIL-51-2015. We have been particularly focused on FAQ No. F5, dealing with the treatment of non-maturity deposits.

We agree with the FDIC’s treatment of non-maturity deposits in revised FAQ No. F5 – both the restatement of the question and content of the related answer. The guidance in revised FAQ No. F5 correctly reflects, we believe, applicable legal requirements.

We appreciate the staff’s consideration of comments submitted on FAQ No. F5 as initially issued in January 2015.

Sincerely,



Mark P. Jacobsen