Dir Sir

I would like to affirm my suggestion as to the assessment procedure for de novo banks.
I would suggest it would be "fair "to assign risk based weightings to this group based on their age, financial performance, and most recent CAMELS rating. Rather than group the new banks together, it would seem reasonable that a 5 year old bank that meets established criteria would pose less risk than a 1 year old bank that has yet to reach profitability.
We, for example, are 4 years old, CAMELS rating [redacted], and in the upper percentile of peer group in profitability. While I recognize we need to pay our share, I do not feel it equitable to pay at the ceiling rate (wherever that is set) given our performance and history.
Likewise, given the pace of today's financial service sector, I would suggest that after 5 years, a financial institution should not be considered new and if an institution merges with an established entity, the resulting institution should not be considered new.
Please consider this as a comment letter under your current proposal and if I may provide further clarification, please advise.

Larry A. Heaton
Chairman, President & CEO
Franklin Community Bank
400 Old Franklin Turnpike
Suite 100
Rocky Mount,
Va. 24151