

From: [Virginia "Ginny" Dietmeier](#)
To: [Comments](#)
Subject: July 13, 2015-Assessments-RIN 3064-AE37
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Attachments: [image002.png](#)

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The State Bank of Davis is part of a reciprocal deposit placement network. We have found reciprocal deposits to be an important source of funding. We strongly urge the FDIC to continue to separate the treatment of reciprocal deposits from that of traditional brokered deposits in setting assessments. Reciprocal deposits are stable sources of funding that do not present the risks and other characteristics of traditional brokered deposits.

We strongly urge you to retain the current systems exclusion of reciprocal deposits from the definition of "brokered" for assessment purposes.

Thank you.

Ginny Dietmeier
Sr VP/Cashier
STATE BANK OF DAVIS

Ginny



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