

From: Bryan Haun (Corporate)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] September 4, 2019 - Interest Rate Restrictions on Institutions That Are Less Than Well Capitalized - Notice of Proposed Rulemaking; Comment Request (RIN 3064-AF02)
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The current definition of a national rate definitely needs changing. Although our bank is not concerned with being Less than Well Capitalized, the national rate cap is also used in exams to determine concentrations of deposits that exceed that cap. This is where I disagree with the drastically low national rate compared to my local market rates. I am not sure if your definition of insured financial intuitions includes credit unions, but it should as they are typically the highest rate payers in our local markets. By the way, how would you calculate their market share in a local market since they are not required to submit a Summary of Deposits report by branches like banks? Also, you need to consider odd term CDs and round them to the nearest common interval. Do you think a 12 month CD rate of 1.61% is representative of a bank when it is also offering an 11 month rate of 2.12? Which rate am I competing against in the 1 year timeframe?

Thanks for your consideration of these comments.

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