

May 3, 2019

Mr. Michael J. Dean
Regional Director
Atlanta Regional Office
Federal Deposit Insurance Corporation
10 10th Street, NW, Suite 800
Atlanta, GA 30309-3849

Dear Mr. Dean:

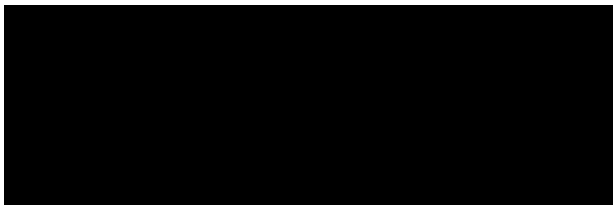
Thank you for the prompt and efficient manner in which the Federal Deposit Insurance Corporation is reviewing the proposed merger of BB&T and SunTrust banks, both of which are members of the American Bankers Association. The decision to merge represents an important business judgment that has been the focus of careful and intense work by these two banking organizations.

While ABA takes no position on any of the business organization plans of our members, we do appreciate the importance of a thorough, timely, and independent review of proposed mergers in full keeping with the relevant laws and regulations. Dispassionate and fair evaluation is what the law contemplates and what we, of course, would expect from the Federal Deposit Insurance Corporation.

The laws governing bank organization are designed to facilitate the ability of banks to identify the business structures and models that they determine will best serve their customers, represent the interests of their shareholders, and promote the economic prosperity of the communities in which they operate. As conditions and interests of their customers change and evolve, banking organizations need to be able to do so as well, with regulators being given the tools to make sure that applicable laws are followed and prudential standards met.

Again, we thank you and your agency for a prompt and unbiased evaluation of this proposed merger in keeping with the relevant responsibilities that you have been given by statute.

Sincerely,



Bob