

From: [Brad Becker](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] November 29, 2019 - Request for Information on a Framework for Analyzing the Effects of FDIC Regulatory Actions; Notice and request for information (RIN 3064-ZA13)
Date: Wednesday, December 04, 2019 3:34:06 PM
Attachments: [image001.png](#)
[image003.png](#)

My comments are that your background information is too lengthy to start with, just like most things coming from a regulatory agency.

Cost Benefit analysis can be biased one way or another. My thoughts are simple, as a former 11 year field examiner, and 20 year banker, credit risk is the issue that has caused 90% of the bank failures. Look at your regs, various other things implemented for liquidity, etc. and there is way too much emphasis on other items. Spend our money/time looking at the loan portfolios and the rest will take care of itself. You could get rid of about 1/3 of your staff that spend time on other things, where there is of course some risk, but not risk to the insurance fund, which should be your focus.

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