

**From:** [Bob Meyerson](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] RIN 3064-ZA13  
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Robert E. Feldman, Executive Secretary

Attn: Comments

FDIC

550 17<sup>th</sup> Street, NW

Washington, DC 20429

Dear Mr. Feldman, et al:

Just a thought on the cost benefit analysis of regulatory analysis: the old Federal Reserve's Functional Cost Analysis (gone now for some 15 years or more) had participating institutions keep track of every minute spent on various banking tasks in order to derive a cost, based on the banker's hourly wage, for each function in the bank. This kind of analysis, modified by such things as legal & consulting fees, but encompassing everyone involved in addressing the action, might serve to nail down the monetary costs at stake. Of course this doesn't address the more elusive costs: reputation harm, capital and investor consequences (if any), stress, etc., nor the benefits derived (which could possibly be functionally costed out). For these I have no suggestions other than to enumerate them all with little essays.

Of course the trick is to get bankers to participate in what can be an excruciating assignment.

Perhaps the FDIC could pay for time spent, or some show of appreciation by shortening the time spent on regulatory examinations. A wild idea, I know.

Robert Meyerson, Chairman

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