

**From:** Jennifer N. Lawton <jlawton@ourpsb.com>  
**Sent:** Wednesday, July 12, 2023 4:10 PM  
**To:** Comments  
**Subject:** [EXTERNAL MESSAGE] May 22, 2023 - Special Assessments Pursuant to Systemic Risk Determination - Notice of Proposed Rulemaking; Comment Request (RIN 3064-AF93)

Mr. James P. Sheesley  
Assistant Executive Secretary  
Attention: Comments—RIN 3064-AF93  
Federal Deposit Insurance Corporation  
550 17th Street NW  
Washington, DC 20429  
Dear Mr. Sheesley:

I am writing in response to the FDIC's request for comment on special assessments following the systemic risk found in uninsured deposits after the failures of SVB and SBNY. I applaud the FDIC's decision to exempt community banks with fewer than \$5 billion in assets from paying any special assessment for the large bank failures of SVB and SBNY, and I encourage the FDIC to finalize its rule as proposed.

I am the Vice President of Compliance and CRA (Community Reinvestment Act) for People's Savings Bank of Rhineland, a \$600 plus million community bank headquartered in Rhineland, MO. People's Savings Bank of Rhineland is a community bank with 11 branches located in central and northeastern Missouri. The Bank has many products that serve the needs of our local and surrounding communities. We offer consumer loans from real estate to cars. We offer commercial and ag loans for capital funding, growth, equipment, inventory, and more. We were a proud supporter of the Paycheck Protection Program during the pandemic and helped not only our current business clients but also other businesses in our community that needed access to the funds.

Many large banks take high risks for the bottom line. These risks place their clients and the FDIC Insurance Fund in perilous positions. A customer should never have to face losing money because of a bank closure. Smaller banks like People's Savings Bank of Rhineland should not be required to pay any special assessment for financial institutions like SVB and SBNY that maintain extraordinary high-risk operations by allowing such a high percentage of uninsured deposits on its books. Banks like Peoples Savings Bank of Rhineland operate in a far less risky and conservative manner. Community banks like ours are more concerned about the well being of customers and consumers in general.

Any special assessments applied to less risky, community banks would only bring additional costs to those banks. These costs would be made up through additional fees passed on to consumers or through other cost cutting measures. Other cost cutting measures may include a bank's ability to service its community through non-bank means such as cuts in charitable donations and actions. Many smaller community groups rely on the charity of local financial institutions to allow them to assist low to moderate income individuals and others.

Again, I applaud the FDIC for looking at the whole picture and not taking a one-size-fits-all approach to applying the special assessment. The exemption of community banks with less than \$5 billion in assets is a very smart and much needed approach.

Thank you for this opportunity to submit my comments on the proposed special assessment.

Sincerely,  
Jenifer Lawton

