From:

Danny Whalen <dwhalen@clevelandstatebank.com>

Sent:

Thursday, July 13, 2023 2:50 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

Re: DIF Special Assessment Proposal

Dear Mr. Sheesley:

I am writing in regards to the FDIC's proposal to exempt community banks with under \$5 billion in assets from the proposed special insurance assessment. I am the President & CEO of Cleveland State Bank, Cleveland, Mississippi. We are a \$300 million local community bank founded in 1908 that operates in 2 rural counties in Mississippi with our home office located in the middle of the Mississippi Delta. We provide a wide array of services designed to greatly support the needs of the local communities we serve from agricultural production loans to home mortgage loans to many types of deposit accounts.

Please know our bank and myself strongly support the existing proposal to exempt those banks with less than \$5 billion in assets.

I feel strongly about our conservative, traditional bank management philosophy of having a widely diversified deposit base and a low/manageable ratio of uninsured deposits. Be assured, our goals are to be stable, secure and long serving to our communities and be a leader in the local economic engine. With this said, I can assure you that our bank does not align with riskier, more aggressive banking strategies; thus, we should not be forced to accept the same risk mitigation (additional DIF premiums) as those that choose too. We feel strongly that additional DIF premiums will only take away from resources that could be better deployed and leveraged in our local communities who need us.

In summary, I thank the FDIC for avoiding a "one-size-fits-all" approach to this special DIF assessment and I strongly support and encourage the FDIC to make final its current proposal.

I thank you and the FDIC for this comment opportunity.

Respectfully,

Daniel F. Whalen

President & CEO

NMLS #467023

