

**From:** Derek Williams <derekwilliams@centurybankonline.com>  
**Sent:** Wednesday, July 19, 2023 9:23 AM  
**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 regarding the FDIC's proposal to exempt community banks under \$5 billion from the special assessment made necessary by the failures of SVB and SBNY. I am President and CEO of Century Bank & Trust in Milledgeville, GA. We are a roughly \$350 million asset bank in rural Georgia and just celebrated the 125<sup>th</sup> anniversary of our bank charter and service to our community. We provide the typical community bank array of services and serve primarily consumers and our small business community. I am also active in the community banking industry and currently serve as Chairman of the Independent Community Bankers of America, the only national banking trade association that represents the interests of only community banks. I believe passionately in the community banking relationship-banking model and believe it is the primary reason our country enjoys such a thriving small business environment and full access to banking services in our most rural areas.

I strongly support the FDIC's proposal to limit special assessments to the 113 large banking organizations that hold large amounts of uninsured deposits, and to exempt community banks with fewer than \$5 billion in assets from paying any special assessment. Both Congress and all the US regulatory agencies are aware of the fundamental differences between the balance sheets and business models of community banks versus the large banks. Community banks have well-diversified loan and deposit relationships and relatively few uninsured deposits. Our community banks simply do not pose the systemic risk of the larger banks, and we should not be accountable for losses to the Deposit Insurance Fund caused by the riskiness of those large banks.

I applaud and greatly appreciate the FDIC's decision to recognize these facts with the proposed rule and strongly encourage the FDIC to finalize the rule as proposed. Thank you for the opportunity to comment on the proposed rule. Please feel free to contact me if I may be of service.

Derek B. Williams

*Derek B. Williams*

**President & CEO**  
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