



July 21, 2023

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

**RE: Special Assessments Pursuant to Systemic Risk Determination  
Comments - RIN 3064-AF93**

Dear Mr. Sheesley:

The Louisiana Bankers Association (LBA) appreciates the opportunity to comment on the FDIC's *Notice of Proposed Rulemaking on Special Assessments Pursuant to Systemic Risk Determination*. The LBA is the only banker's association in the state of Louisiana and made up of 117 member banks and thrifts.

LBA appreciates and supports the FDIC's proposal to use an assessment base for the special assessments equal to an insured depository institution's estimated uninsured deposits, reported as of December 31, 2022, adjusted to exclude the first \$5 billion in estimated uninsured deposits. This methodology will ensure that no community bank with less than \$5 billion in assets, or less than \$5 billion in uninsured deposits, will pay any special assessment for the failures of Silicon Valley Bank and Signature Bank, New York.

LBA also requests that the FDIC clarify in the final rule that collateralized public funds deposits are not uninsured deposits for purposes of calculating the special assessment base. When public funds are held by our member banks they must pledge marketable securities as collateral for deposit account balances in excess of the deposit insurance limit of \$250,000. These collateralized public funds do not pose risk to the Deposit Insurance Fund. Therefore, LBA respectfully requests a clear exemption for collateralized public funds deposits from the special assessment base.

Thanks for your consideration of the above comments.

Sincerely,



Joe Gendron  
Director of Government Relations