

September 25, 2025



Ms. Jennifer M. Jones

Deputy Executive Secretary
Attention: Comments RIN 3064-AG15
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, D.C. 20429
Comments@fdic.gov

Re: Comments to RIN 3064-AG15 Proposal to Update Certain Regulatory Thresholds

Dear Deputy Executive Secretary Jones,

On behalf of the America First Policy Institute's Governors Council, we write in support of the Federal Deposit Insurance Corporation's (FDIC) proposal to update regulatory thresholds for community banks to reflect inflation and to index these thresholds going forward.

For more than 30 years, thresholds for costly reporting and audit requirements have not kept pace with inflation. As a result, many community banks are now treated like large financial institutions, facing unnecessary costs that take time and money away from their core mission: lending to small businesses, farmers, and families across Main Street America.

The FDIC's proposed adjustment, raising the outdated \$500 million threshold to \$1 billion, would immediately ease the burden on more than 770 community banks. These dollars and hours saved will flow back into our local economies, fueling small business growth, supporting family farms, and strengthening state and regional economic development. Importantly, the FDIC has found that this change will have no negative effect on the safety and soundness of banks.

The Governors Council believes that strong community banks are the backbone of vibrant states and thriving main streets. Inflation under the Biden Administration has already strained families and businesses; without this regulatory adjustment, it also quietly increases pressure on the very banks that sustain them. Aligning rules with reality is a commonsense step that restores fairness and supports local prosperity.

We commend the FDIC for this proposal and urge swift adoption. By ensuring regulations reflect real growth, not just inflation, this rule will strengthen community banks and empower governors and state leaders to continue building opportunity from the ground up.

Respectfully,



Hon. Phil Bryant

AFPI Founder, America First
Governors' Council
64th Governor of Mississippi



Hon. Bobby Jindal

AFPI Chair, America First
Governors' Council
55th Governor of Louisiana



Hon. Mike Braun

52nd Governor of Indiana



Hon. Mike Dunleavy

12th Governor of Alaska



Hon. Jeff Landry

57th Governor of Louisiana



Hon. Bill Lee

50th Governor of Tennessee



Hon. Brad Little

33rd Governor of Idaho



Hon. Kim Reynolds

43rd Governor of Iowa



Hon. Larry Rhoden

34th Governor of South Dakota



Hon. Sarah Sanders

47th Governor of Arkansas



Hon. Kevin Stitt

28th Governor of Oklahoma