

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The FDIC's proposed adjustment, raising the outdated \$500 million threshold to \$1 billion, would immediately ease the burden on more than 770 community banks.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