

Dwight Faulkner
Senior Vice President
Bank of the Flint Hills



September 9, 2025

Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Subject: Comments on Proposed Rules RIN 3064-AG15

Dear Sir or Madam,

I am writing to provide comments on the FDIC's proposed rules under RIN 3064-AG15 regarding the adjustment and indexing of regulatory thresholds to reflect inflation. As the Senior Vice President of Bank of the Flint Hills, a \$490,000,000 institution located in eastern Kansas, I appreciate the effort to ensure that regulatory thresholds remain relevant in today's economic environment.

The current thresholds, established in 1991, have not kept pace with inflation or the evolving regulatory landscape. I strongly recommend that the FDIC adjust these thresholds to accommodate for inflation. A conservative estimate of a 2% annual inflation rate over the past 34 years would necessitate a recalibration of the threshold levels.

Using this inflation factor, the compounded effect can be calculated using the formula for compound interest:

New Threshold = Old Threshold x (1 + inflation rate) ^number of years

New Threshold = Old Threshold x (1 + 0.02) ^34

If we assume the original threshold was set at \$500,000,000, for example, the calculation would be:

New Threshold = \$500,000,000 x (1.02) ^34

New Threshold = \$500,000,000 x 2.0304 (approximately)

New Threshold = \$1,015,200,000

Therefore, I propose that the FDIC consider adjusting the regulatory thresholds to reflect this calculated value, ensuring they are appropriately aligned with current economic conditions and regulatory requirements.

Thank you for considering my comments on this important issue. I believe that adjusting the thresholds will not only benefit institutions like ours but also enhance the overall effectiveness of regulatory compliance in the banking sector.

Sincerely,

Dwight Faulkner
Senior Vice President
Bank of the Flint Hills