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FDIC Rule Makers,

I am writing to offer a perspective on the FDIC's proposed rule regarding 'FDICIA Part 363' (the 'Proposed Rule'), drawing upon both our institution's direct experience and a broader understanding of the unique challenges faced by community banks. The thoughtful recalibration of this rule has significant implications not only for the sustainability of smaller banks, but also for the resilience and inclusivity of the national financial system as a whole.

My name is Bill Schonacher, and I have the privilege of serving as President and CEO of Chickasaw Community Bank (CCB) in Oklahoma City, OK. As a \$450MM Minority Deposit Institution wholly owned by the Chickasaw Nation, CCB operates at the intersection of financial stewardship and community advancement. Our commitment to affordable housing for Native Americans is embodied in our role as the leading HUD-184 program originator nationwide—a distinction that highlights both the persistent barriers to homeownership in Native communities and the critical role specialized lenders play in addressing these disparities. Additionally, our engagement with Native American entrepreneurs—supported by the Bureau of Indian Affairs and Small Business Administration loan guaranty programs—underscores the multifaceted ways community banks extend economic opportunities where they are most needed.

From this vantage point, we recognize that the Proposed Rule is more than a technical adjustment; it is a necessary evolution that acknowledges the operational realities of community banks. The increasing regulatory and compliance demands over recent decades have contributed to a steady consolidation within the industry, often at the expense of locally focused institutions. For banks with assets between \$500 million and \$1 billion, the disproportionate burden of compliance—often managed by small teams with overlapping responsibilities—can divert resources away from direct customer service and prudent risk management. The proposed increase in FDICIA reporting thresholds would alleviate these pressures, enabling community banks to maintain high standards of safety and soundness while continuing to fulfill their essential mission in the markets we serve.

It is also important to recognize the economic context in which these thresholds were originally set. Asset values have grown substantially since the rule's inception; in inflation-adjusted terms, a \$500 million bank in 1991 would be equivalent to over \$1.1 billion today. This shift underscores the need for regulatory frameworks that remain relevant as the scale and complexity of banking evolve. The updated thresholds offer a pragmatic alignment with the original intent of the rule, preserving rigorous oversight while ensuring that compliance requirements do not inadvertently undermine the capacity of community banks to serve their communities effectively.



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In conclusion, Chickasaw Community Bank strongly supports the proposed revisions to FDICIA Part 363 thresholds. We believe these changes will empower community banks to uphold their vital role within the financial ecosystem, especially for those who operate within populations and regions that have historically been underserved.

Thank you for your consideration.

[Redacted Signature]

Bill Schonacher
President and CEO
Chickasaw Community Bank