

October 6, 2025

Via Electronic Submission: www.fdic.gov/federal-register-publications

Jennifer M. Jones, Deputy
Executive Secretary,
Attention: Comments—RIN 3064-AG14
Federal Deposit Insurance Corporation,
550 17th Street NW
Washington, DC 20429

Re: Comments on Notice of Proposed Rulemaking Regarding FDIC Official Signs and Advertising Statement Requirements (RIN 3064-AG14)

Dear Ms. Jones:

International Bancshares Corporation (“IBC”) is a publicly traded, multi-bank financial holding company headquartered in Laredo, Texas. IBC maintains 166 facilities and 256 ATMs, serving 75 communities in Texas and Oklahoma through five separately chartered banks (“IBC Banks”) ranging in size from approximately \$490 million to \$9.5 billion, with consolidated assets totaling over \$16 billion. IBC is one of the largest independent commercial bank holding companies headquartered in Texas.

IBC appreciates the opportunity to comment on the FDIC’s Notice of Proposed Rulemaking regarding signage and advertising statement requirements under 12 CFR Part 328. IBC supports the FDIC’s efforts to clarify and streamline signage requirements for digital deposit-taking channels and ATMs. However, we urge the FDIC to recognize the operational and financial burden that results from frequent changes to signage rules. The 2023 Final Rule introduced sweeping requirements for digital signage, only to be followed by delays and now a new proposal that reverses or modifies many of those same provisions. This lack of regulatory consistency imposes real costs on banks—especially community banks—who must repeatedly revise systems, renegotiate vendor contracts, and retrain staff to comply with shifting standards.

IBC previously submitted comments in 2023 expressing concern that the FDIC’s approach disproportionately penalized insured depository institutions while failing to address the root cause of consumer confusion: misleading representations by non-bank fintechs. That concern remains. The current proposal acknowledges implementation challenges and

consumer confusion, yet those challenges were foreseeable and largely stem from the overly prescriptive nature of the 2023 rule. We appreciate the FDIC's willingness to revisit these requirements, but we caution that further changes—without a stable, long-term framework—will only compound the burden on regulated institutions.

We strongly support the FDIC's proposal to eliminate the requirement to display the FDIC official digital sign on "pages where the customer may transact with deposits" and to narrow the scope of non-deposit signage to pages primarily dedicated to non-deposit products. These changes reflect a more practical and targeted approach. However, banks that have already invested in compliance with the 2023 rule may now face additional costs to reverse or modify systems. The FDIC should consider safe harbor provisions or transition relief for institutions that have already implemented the prior requirements in good faith.

IBC also supports the proposed flexibility in design standards for the FDIC official digital sign, including the removal of specific hexadecimal color codes and font sizes. These changes will help banks adapt signage to various digital environments without sacrificing clarity or consumer protection.

Finally, we reiterate our request from 2023: the FDIC should provide a standardized, optional template for digital signage—similar to model forms used in other consumer protection regulations. This would reduce compliance uncertainty and level the playing field for smaller institutions that rely on third-party vendors.

In conclusion, IBC urges the FDIC to adopt a consistent, durable framework for signage requirements that minimizes disruption and recognizes the operational realities of community banking. Regulatory clarity and stability are essential to maintaining consumer confidence and supporting innovation in financial services.

Thank you for the opportunity to provide these comments.

Sincerely,

A black rectangular redaction box covering the signature of Dennis E. Nixon.

Dennis E. Nixon

President and CEO

International Bancshares Corporation

