



September 15, 2025

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

Sent via email Comments@fdic.gov
Subject RIN 3064-AG15

Dear FDIC Representative,

As Chief Administrative Officer of Troy Bank & Trust, a \$1.6 billion-dollar community bank proudly serving Southeastern Alabama since 1906, I'm writing to express our strong support for the FDIC's proposed updates to Part 363 of the FDICIA regulations.

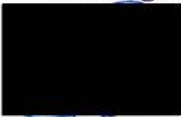
We appreciate the FDIC's thoughtful recognition that the longstanding asset thresholds for audit and governance requirements no longer reflect the realities of today's banking environment. These thresholds, originally designed for larger and more complex institutions, have remained unchanged for decades. Over time, inflation and organic growth have pushed many community banks like ours into compliance frameworks that don't align with our risk profile or operational complexity. This has led to increased costs and administrative burdens, diverting resources from what matters most, which is serving our customers and communities.

The proposal to raise the asset threshold for annual independent audits from \$500 million to \$1 billion, and the threshold for internal control over financial reporting (ICFR) audits from \$1 billion to \$5 billion, is a meaningful and much-needed adjustment. We also support the FDIC's plan to index these thresholds to inflation going forward, ensuring that regulatory requirements remain fair and relevant over time without the need for repeated rulemaking.

As a community bank, we operate under strong regulatory oversight and take our responsibilities seriously. But we also believe regulation should be proportional. The FDIC's proposal respects that principle and offers relief where it's warranted—without compromising safety or soundness.

Thank you for listening to the concerns of community banks and for taking action to support our continued strength and sustainability. We respectfully urge you to move forward with the proposed changes.

Best regards,


John R. Ramage
Chief Administrative Officer

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