



September 2, 2015

Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Re: Federal Deposit Insurance Corporation Notice of Proposed Rulemaking (RIN 3064-AE37)

Dear Mr. Feldman:

Bank First National supports the proposed refinements to the deposit insurance assessment system for small insured depository institutions. The goal of this proposed rule is to better align assessments with underlying risk in an institution. We fully support this stated goal.

While we feel that reciprocal deposits carry an elevated risk over typical core deposits, we do concur with the majority of commenters that reciprocal deposits do not carry the same elevated risk characteristics as traditional brokered deposits. We encourage the FDIC to consider a compromise in this area that would allow the assessment formula to treat reciprocal deposits separately from traditional core deposits and yet not group them in with traditional brokered deposits.

Thank you.

Sincerely,

A handwritten signature in dark ink that reads 'Mike'.

Michael B. Molepske  
President & Chief Executive Officer

A handwritten signature in dark ink that reads 'Kevin'.

Kevin M. LeMahieu  
Chief Financial Officer

For Better Banking, Think First.



402 N. Eighth St. P.O. Box 10 MANITOWOC, WI 54221-0010 (920) 652-3100

[BankFirstNational.com](http://BankFirstNational.com)