


**From:** [Sam Haskell](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] Rin 3064 AF99 the brokered deposit rule  
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After reading this the rule it doesn't address the Synapse ledger issue. It just makes it harder for tech friendly banks to do BaaS banking and other banks to work with property managers and law firms. These deposit verticals held up well during Silicon Valley and strengthen the small banks the FDIC is slowly choking off in favor of private credit.

This is a pro cyclical rule.

Banks and technology have to evolve work together properly and this is a poorly thought out brake on that system.

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