



Comments submitted 9.14.2024 to: [comments@fdic.gov](mailto:comments@fdic.gov)

September 14, 2024

**Subject:** Comment Request– RIN 3064-AF-99

Dear Mr. Sheesley,

I am the Executive Vice President of PennAg Industries Association – the premier agribusiness trade association in Pennsylvania. On behalf of our dedicated members and leadership, I am writing to voice our concerns regarding the FDIC's proposed changes to the rules limiting modern, innovative sources of funding for our community financial institutions. These changes pose significant risks to our members, including farmers, small businesses owners, and the rural communities that depend on them.

Farming is a capital-intensive industry, requiring substantial investment in equipment, land, and labor. To manage these financial demands, farms and agribusinesses rely heavily on their community banks that understand their unique needs. To thrive in our modern economy, these businesses need strong community banks that can help them navigate economic challenges, expand operations, and create jobs.

By severely limiting access to innovative funding solutions, these changes by the FDIC could make it more difficult for community banks to secure the deposits they need to support local agriculture. This, in turn, could lead to fewer loans, higher interest rates, and reduced access to the capital that is essential for maintaining and growing agricultural operations in the commonwealth. The snowball effects would be felt not only by farms but also by the many interconnected businesses that supply and support them, from equipment dealers to feed suppliers and more.

In farming communities across Pennsylvania, where alternative funding sources are often scarce, these changes would put unwarranted pressure on local economies. With our membership in mind, we at PennAg Industries Association encourage the FDIC to reconsider these proposed changes to ensure that our community banks can continue to provide the financial backing that our farms and agribusinesses need to remain competitive.

Thanks for your consideration.

Sincerely,

Christian R. Herr  
Executive Vice President, PennAg Industries Association