



September 2, 2015

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

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

Dear Mr. Feldman:

Sauk Valley Bank & Trust Company is headquartered in Sterling, IL and has \$325 million in assets, 4 full service banking offices and 3 loan production offices. We are part of a reciprocal deposit placement network and have found reciprocal deposits to be an important source of funding and service to local relationship base.

We welcome the opportunity to comment on the Federal Deposit Insurance Corporation (FDIC) Notice of Proposed Rulemaking (NPR) proposing changes to the FDIC's deposit insurance assessment regulation for small banks. In particular, we would like to comment on how this proposal would affect reciprocal deposits.

In short, we strongly urge the FDIC to continue to separate the treatment of reciprocal deposits from that of traditional brokered deposits in setting assessments. Reciprocal deposits are stable sources of core funding that do not present the risks and other characteristics of traditional brokered deposits. We have used reciprocal deposits to facilitate local relationships. We truly view this as a win – win situation in which local dollars remain with a primary banking relationship from a service standpoint and facilitate funding within the community to support economic activity. The separate treatment of reciprocal deposits from that of traditional brokered deposits in the current assessment system recognizes the differences between the two types of deposits. Reciprocal deposits are not just another form of wholesale funding and should not be treated as such.

When it established the current system in 2009, the FDIC recognized that reciprocal deposits "may be a more stable source of funding for healthy banks than other types of brokered deposits and that they may not be as readily used to fund rapid asset growth." Nothing has changed since then. Traditional brokered deposits may in fact prove to be more volatile over time; reciprocal deposits are not.

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Further, as the FDIC's proposal itself points out, the premium assessment for an institution is supposed to reflect the risks posed by its assets and liabilities. Those risks must be specific and should be measurable.

We do not believe reciprocal deposits present the same risks and concerns that traditional brokered deposits do: primarily instability and risk of rapid asset growth. On the contrary, our reciprocal deposits come from local customers. We typically have a relationship with our customers that go far beyond merely accepting their deposits. We set reciprocal deposit interest rates based on local rates. Our experience is that reciprocal deposits "stick" with the bank. For all these reasons, they add to our bank's franchise value.

The FDIC in its proposal gives no justification for treating reciprocal deposits like traditional brokered deposit: no facts, no figures, and no analysis. Rather, it arbitrarily lumps the two together. In doing so, it would penalize banks that use them by, in effect, taxing them. Such a tax would be unnecessary and unfair. The FDIC's proposal would punish our bank for using one of the few tools we have to compete against the mega-banks doing business in our area. The net effect will be to reduce the choice of bank or earnings of the depositor or reduce the earnings of the bank for maintaining and servicing a local relationship.

Again, we strongly urge you to retain the current system's exclusion of reciprocal deposits from the definition of "brokered" for assessment purposes.

So that we do not have to revisit this issue later, we also strongly urge the FDIC to support legislation to explicitly exempt reciprocal deposits from the definition of brokered deposit in the Federal Deposit Insurance Act.

Thank you.

Sincerely,



Dirk Meminger
President & CEO

cc: The Honorable Richard Durbin
711 Hart Senate Office Building
United States Senate
Washington, D.C. 20510

The Honorable Mark Kirk
524 Hart Senate Office Building
United States Senate
Washington, D.C. 20510

The Honorable Cheri Bustos
1009 Longworth House Office Building
United States House of Representatives
Washington, D.C. 20515

The Honorable Martin J. Gruenberg
Chairman
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