

From: [John Barrett](#)
To: [Comments](#)
Subject: [REDACTED] August 23, 2024 Unsafe and Unsound Banking Practices: Brokered Deposits Restrictions; Comment Request (RIN 3064-AF99)
Date: Wednesday, November 20, 2024 5:13:31 PM

[REDACTED]

Mr. James P. Sheesley
Assistant Executive Secretary
Attention: Comments—RIN 3064-AF99
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Dear Mr. Sheesley:

I am President and CEO of FNB Oxford Bank in Oxford, MS. FNB is a \$775 million, CDFI institution located in North Mississippi. I am writing to express my concerns regarding the FDIC's proposed rule relating to Unsafe and Unsound Banking Practices: Brokered Deposits Restrictions. My belief is that this proposal will harm community banks in our efforts to serve our customers.

Although FNB Oxford's deposit franchise is strong and growing, we must rely on a variety of funding sources to accommodate the lending demands of our markets. Achieving significant organic deposit growth in highly competitive markets is difficult and takes time. Community banks need access to diverse and timely funding sources, as we manage liquidity. FNB Oxford has been successful in achieving double-digit loan growth over the past couple of years, aided in large part by the usage of callable brokered deposits and other 3rd party deposit services. My belief is that the FDIC should not, in effect, limit access to these cost-effective, contractual funding sources.

I am also concerned about the proposed rules' impact on public deposits. Traditionally, community banks are very involved in servicing accounts of various municipalities and government entities within our local markets. Whether or not public deposits are placed by advisory firms, their nature of being a stable, contractual source of funding is not impacted; therefore, public deposits should not be categorized as brokered.

Thank you for the opportunity to comment.

Sincerely,

John L. Barrett
FNB Oxford Bank