

**From:** [Len Suzio](#)  
**To:** [Comments](#)  
**Cc:** [Josh Suzio](#)  
**Subject:** [REDACTED] RIN 3064-ZA42  
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To whom it may concern,

I am writing in response to your request for comments regarding Deposit information. Several times in the request RIM 30-64-ZA42 "depositor proximity" is mentioned. We strongly encourage the FDIC to require an annual report of depositor location. As you know, all deposit information reported on the Summary of Deposits is based on the deposit location attributed to the branch where the deposit has been maintained. The location of the depositor is not reported. This is a major handicap in banking regulations and became glaringly apparent when the FDIC, OCC, and FRB were developing the new 2023 CRA Rule.

It has been assumed that technology developments including the advent of the Internet in the last 50 years has dramatically affected the location of depositors. But we know of no database that has identified the location of depositors relative to the banks in which they maintain deposits. This is important information, especially with respect to regulations such as the Community Reinvestment Act ("CRA") which requires banks to lend back to the communities from which they obtain their deposits. The capture of that information is not difficult nor is it expensive.

The CRA requires the capture of loan data based on census tract and is readily processed by commercial software for CRA reporting purposes. That same software could easily geocode the location of depositors (note: GeoDataVision is not a software company). Deposit accounts can be geocoded to precise addresses and the data aggregated by census tract for analysis. The only impediment is the quality of the deposit databases maintained by banks which often have depositor locations based on PO Box. The ability to develop the profile of depositor locations would be a valuable addition to the analysis of a bank's lending performance in the communities it serves and a valuable complement to the loan analysis based on loan locations. Regulators would then have the ability to determine if a bank is lending back into the communities where it obtains its deposits.

We strongly encourage the FDIC to require the reporting of deposit location by census tract as a valuable tool allowing a more comprehensive analysis of a bank's performance in the communities it serves. This also would allow the agency to identify the risk to any community where a bank may have concentrations of depositors which we believe should be a consideration as the Agency makes determinations regarding the deposit information to be reported by institutions with FDIC-insured deposits.

Respectfully,

Len Suzio, President



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