

**From:** [Craig Wanichek](#)  
**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 5:26:58 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 the CEO of Summit Bank in Eugene, OR. We are a \$1.3 Billion community bank serving 5 communities in Oregon. We are primarily a small business commercial bank. Due to fluctuating deposit balances, we at times we have relied on several types of funding sources for shorter periods of time and a small amount of non-core funding for the last 12 months. The proposed rule seems overly restrictive as we are exploring different ways to fund the growth of the Bank. We have been a successful small business lending bank, growing assets at approximately 20% over the last 10 years. Any new funding initiative would be discussed with the FDIC and would have prudent limits. Our internal risk management practices have kept us safe and liquid in times of stress and limiting options which are currently examined and regulated is unnecessary. Please consider eliminating the proposed regulation.

Sincerely,

Craig Wanichek

President and CEO

Summit Bank