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As the rule had mentioned, the FDIC is concerned that small IDI's are using brokered deposits as a loophole to grow customer assets and using assets in a way that is deemed risky by the agency. It sites First Republic Bank and the correlation of the bank failing and the rise of brokered deposits as an indication of potential misuse or abuse by the IDI. In the same paragraph the agency also sites cryptocurrency company Voyager and it's dissolution due to its similar pattern of using brokered deposits before it's failure. However, the proposed amendments do not address two things that I think would help in determining if an IDI can participate in brokered deposits: Internal control and asset size.

While the revisions in section 3 would be a good start, I believe that having the FDIC administer guidelines on the bare minimum requirement for Internal Control Oversight programs regarding the inherent risky nature of such transactions and potentially requiring a minimum asset size to ensure the DIF isn't taking the burden of reimbursing the customers of the IDI if the firm fails.