

From: [Mike Branton](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] RIN 3064-AE94
Date: Tuesday, February 18, 2020 11:30:01 AM

Sir or Madam:

Redefining and modernizing the definition and regulation of brokered deposits is well overdue and a positive move. However, the proposed definition of brokered deposits and a deposit broker is way too broad and incorporates many credible, value-adding and long standing third-party providers like my company as well as my primary and adjacent competitors, all which provide banks, particularly community banks, with innovative solutions they can't create themselves to better service their customers.

More work needs to be done on this ruling to make this needed redefinition more practical in application to the marketplace and to help support the much needed community banks and their individual and overall contributions to the consumer marketplace. Under its current state, it doesn't do this and actually restricts and hurts community banks rather than helps them.

My request is that the FDIC revise the proposed regulation for it to be more fairly applied to marketplace conditions, so that it unquestionably helps community banks and their customers.

Your consideration of this request is greatly appreciated.

Sincerely,

Mike Branton

Partner

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