From: Farmers and Merchants Bank, Randy Johnson

Proposal: 1509 (AE30) Reg Q,Y&LL; Small BHC Policy Statement; Capital Adequacy Board -Regulated Institutions;

Subject: Small BHC Policy Statement; Capital Adequacy Board-Regulared Institutions; Bank Holding Companies; S

Comments:

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Proposal:Small Bank Holding Company Policy Statement; Capital Adequacy of Board-Regulated Institutions; Bank Holding Companies; Savings and Loan Holding Companies; Changes to Reporting Requirements. [R-1509]
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Your comment:We are a bank holding company with assets just over $500M and if the asset size were raised from $500M to 1 billion it would impact us in the following way:
- F&M would have the ability to borrow (if need be) for any additional mergers or acquisitions
- A potential cost savings relating to the audit requirement
- Continuation of a 'normal' examination cycle of 18 months (this would be expedited to a 12 month rotation for F&M if the asset size threshold for Small Bank Holding Companies remain at less than $500 mil)
- Avoidance of additional internal reporting to the Fed at the holding company level

As outlined this would be a very positive impact on our Bank in from both a cost of doing business and for future expansion.

Thank you.