

From: Farmers and Merchants Bank, Daniel Lynch
Proposal: 1509 (AE30) Reg Q, Y&LL; Small BHC Policy Statement; Capital Adequacy Board-Regulated Institutions;
Subject: Small BHC Policy Statement; Capital Adequacy Board-Regulated 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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First name: Daniel

Middle initial: M

Last name: Lynch

Affiliation (if any): Farmers and Merchants Bank

Affiliation Type: Commercial (Com)

Address line 1: 101 E Main St

Address line 2:

City: Manchester

State: Iowa

Zip: 52057

Country: UNITED STATES

Postal (if outside the U.S.):

Your comment: I am supportive of the Federal Reserve Docket No. R-1509 for raising the asset size threshold for Small Bank Holding Companies from \$500 Million to \$1 Billion. This limit was last raised in 2006 and merits this action by the Board. This permanent change to the currently effective 6 month action taken on December 18, 2014, would benefit small to medium sized Banks and the customers and communities in which they serve. In addition, this proposed permanent change would allow small Bank Holding Companies to be more operationally efficient thereby being of better service to their customers. I foresee no unintended consequences for small banking organizations and support the Board in passing a permanent change to Docket No. R-1509 in the current form that it is written.