

RANGE BANK, BRETT GIRARD

Proposal and Comment Information

Title: Loans to Executive Officers, Directors, and Principal Shareholders of Member Banks; Bank Holding Companies (Reg O and Y), R-1896

Comment ID: FR-2026-0028-01-C35

Submitter Information

Organization Name: Range Bank

Organization Type: Company

Name: Brett Girard

Submitted Date: 10/09/2026

Please find attached Range Bank's comments regarding RIN 7100-AH27



October 9, 2026

Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

Re: Loans to Executive Officers, Directors, and Principal Shareholders of Member Banks; Bank Holding Companies; RIN 7100—AH27

To the Members of the Board:

On behalf of Range Bank, thank you for the opportunity to comment on the Federal Reserve's proposed revision to Regulation O. We support the proposal because it updates several aspects of the regulation that have not kept pace with today's banking environment while maintaining the protections intended to prevent preferential insider lending and conflicts of interest.

As a community bank, we are particularly supportive of the proposed changes to the regulation's dollar-based thresholds. Many of these thresholds have remained largely unchanged since 1979, despite significant inflation, economic growth, and changes within the banking industry. Updating and indexing these thresholds will help ensure the regulation continues to operate as intended without weakening the underlying safeguards or governance expectations surrounding insider lending.

We believe the proposal appropriately recognizes that a regulatory framework should evolve as economic conditions and banking practices change. Community banks play an important role in supporting local businesses, families, and economic development, and regulatory requirements are most effective when they reflect current economic conditions and banking practices.

Overall, Range Bank believes the proposal strikes an appropriate balance between safety and soundness, transparency, and regulatory efficiency. We encourage the Federal Reserve to adopt the proposed amendments.

Sincerely,

A handwritten signature in black ink, appearing to read "Brett Girard".

Brett Girard, CPA
VP, Finance & Risk Officer
Range Bank

