INDEPENDENT COMMUNITY BANKERS of AMERICA®

January 16, 2014

The Honorable Maxine Waters Ranking Member Committee on Financial Services U.S. House of Representatives Washington, D.C. 20515

Dear Ranking Member Waters:

On behalf of the nearly 7,000 community banks represented by ICBA, I write to thank you and your Financial Services Committee colleagues for your recent letter (see attachment) to Federal Reserve Vice Chair Janet Yellen. Community bankers sincerely appreciate your recognition and support for their policy concerns and ongoing viability.

Your letter made all of the right points with regard to the unique character of community banks, their significance to the local economies they serve, and the regulatory threat they continue to face. I am confident that your message to the new Chair will make a strong impression given her critical economic and regulatory post. Community banks sincerely appreciate the support of concerned Members of Congress and will need the cooperation of the Federal Reserve to continue to best serve their communities.

Thank you again. I look forward to working with you in 2014 to advance sensible and balanced regulatory relief for community banks.

Sincerely,

/s/

Camden R. Fine President and CEO

CC:

Rep. Stephen Lynch Rep. Gary Peters Rep. Denny Heck Rep. Michael E. Capuano Rep. Al Green Rep. Joyce Beatty

Rep. Keith Ellison

Rep. Gregory W. Meeks Rep. John C. Carney Rep. Bill Foster Rep. Emanuel Cleaver Rep. Daniel T. Kildee

Rep. Rubén Hinojosa

ATTACHMENT: January 10 letter to Federal Reserve Vice Chair Janet Yellen

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United States House of Representatives Committee on Financial Services

Washington, D.C. 20515

January 10, 2014

The Honorable Janet Yellen Vice Chair Federal Reserve Board of Governors 20th Street and Constitution Ave, NW Washington, D.C. 20551

Dear Vice Chair Yellen:

Congratulations on your historic confirmation to head the Federal Reserve. We are confident that your wealth of experience and knowledge best positions you to lead our central bank through this critical recovery period. As you begin your term at the Federal Reserve, we ask that you and the Members of the Board of Governors consider the range of unique challenges facing community banks.

Despite the steady economic gains we've seen on Wall Street and among the nation's large banks, community banks continue to face strong headwinds — both regulatory and competitive pressures that will threaten their viability heading into 2014. Preserving these smaller institutions is critically important, as they provide vital financial services to millions of underserved communities across the country and provide almost half of all small loans to our nation's farms. Moreover, their role in supplying credit is critical for small businesses, which employ roughly 48 million Americans.

Community banks have always been distinguished by the unique combination of services they provide to their customers, as well as the manner in which they do business. They tend to be relationship lenders, characterized by local ownership, local control, and local decision making. By offering traditional banking services such as lending and deposit acceptance at the local level, community banks foster economic growth and help to ensure that the financial resources of the local community are put to work on its behalf. Moreover, they have always been inextricably linked to entrepreneurship and business development. According to a study released by the Federal Deposit Insurance Corporation (FDIC), as of 2011, community banks held only 14 percent of banking industry assets, yet they hold 46 percent of the industry's small loans to farms and businesses.

The FDIC further notes that community banks hold the majority of banking deposits in the United States' rural counties. More critically, there are more than 600 counties that have no other physical banking offices except those operated by community banks. According to the FDIC, 16.3 million residents in more than one-third of our nation's counties "would have limited physical access to mainstream banking services without the presence of community banks."

The Honorable Janet Yellen Page Two January 10 2014

In our view, the Board of Governors' proactive engagement on issues concerning community banks could work to assuage the concerns of many small institutions that may not have a robust understanding of the nuances of the Federal Reserve System and may be struggling with the vast range of new Dodd-Frank regulations. Through your leadership on the Board, it is our hope that unique challenges facing community banks are taken into account and reflected in the Fed's policy making and regulatory agenda.

Sincerely,