



MID-SIZE BANK COALITION OF AMERICA

November 24, 2017

The Mid-Size Bank Coalition of America (MBCA), and its undersigned 84 members, appreciate the tremendous bipartisan effort that led to the *Economic Growth, Regulatory Relief and Consumer Protection Act*. We believe it is absolutely vital that this bill be taken up now, and we are committed to working with the esteemed Members of the Senate as the bill moves through the legislative process.

In the nearly eight years since the passage of the Dodd-Frank Act, America's mid-size banks have been hard at work implementing its robust regulatory and supervisory requirements. As this work has unfolded, it has become clear that many of these requirements are inhibiting our ability to generate strong economic and job growth, fully meet the credit needs of consumers and businesses, and more dynamically support the entrepreneurial prospects of our communities to ensure that "Main Street" continues to grow and flourish.

Because the request to support this bill is directly tied to strengthening the ability of mid-size banks to boost economic growth, it is important to explain why mid-size banks are uniquely suited for this purpose:

- Our nation's mid-size banks are crucial to supporting and sustaining small and medium-size businesses and households, especially in smaller and more rural communities. Much like community banks, mid-size banks and their leaders are deeply invested in their communities, which allows them to have exceptional local knowledge and offer clients a high level of service and flexibility. Yet they also have the size to offer greater product depth, broader branch networks, and increased stability – all while maintaining a tried and true customer-focused business model.
- Mid-size banks have built this successful model by focusing on a stable, responsible approach to banking that is centered on traditional products and services, and investments in risk management. This is reflected in consistently high credit quality, a reliance on stable deposit funding, and a relatively greater share of revenue from deposit gathering and local market lending.
- In addition to virtually non-existent individual risk, mid-size banks do not present even a marginal systemic risk. On average, mid-size banks are less than 1/50 of the size of a US G-SIB. The absence of systemic risk is even more pronounced when a mid-size bank is holistically assessed in terms of size, interconnectedness, substitutability, complexity, and cross-jurisdictional activity.

For these reasons, we strongly believe that a healthy and prosperous mid-size banking sector is essential to the continued strength and stability of the American economy. Furthermore, we believe that the *Economic Growth, Regulatory Relief and Consumer Protection Act* will help promote this economic strength and stability by sensibly and appropriately relieving mid-size banks from the imposition of certain regulatory requirements that do not benefit the public in any appreciable way.

We wholeheartedly ask you to support this legislation, and we invite you to contact us with any questions related to this vital issue.

Sincerely,

A handwritten signature in black ink that reads "Bob Jones". The signature is written in a cursive, flowing style.

Bob Jones
Chairman
Mid-Size Bank Coalition of America
812-464-1280-office
812-483-2350-cell

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MID-SIZE BANK COALITION OF AMERICA

1. Ameris Bank (Moultrie, GA)
2. Arvest Bank (Fayetteville, AR)
3. Associated Bank (Green Bay, WI)
4. BancorpSouth (Tupelo, MS)
5. Banner Bank (Walla Walla, WA)
6. BankUnited (Miami Lakes, FL)
7. Banc of California (Santa Ana, CA)
8. Bank Leumi USA (New York, NY)
9. Bank of Hawaii (Honolulu, HI)
10. Bank of the Ozarks (Little Rock, AR)
11. Berkshire Bank (Pittsfield, MA)
12. BOK Financial (Tulsa, OK)
13. Bremer Bank (Saint Paul, MN)
14. Cadence Bank (Houston, TX)
15. Cathay Bank (Los Angeles, CA)
16. Cenlar FSB (Ewing, NJ)
17. CenterState Bank (Winter Haven, FL)
18. Central Banccompany (Jefferson City, MO)
19. Chemical Bank (Midland, MI)
20. City National Bank (Los Angeles, CA)
21. Columbia Bank (Tacoma, WA)
22. Commerce Bank (Kansas City, MO)
23. Community Bank (De Witt, NY)
24. Cullen/Frost Bankers (San Antonio, TX)
25. Customers Bank (Phoenixville, PA)
26. EagleBank (Bethesda, MD)
27. Eastern Bank (Boston, MA)
28. East West Bank (Pasadena, CA)
29. EverBank (Jacksonville, FL)
30. F.N.B. Corporation (Pittsburgh, PA)
31. FirstBank Holding Company (Lakewood, CO)
32. First Citizens Bank (Raleigh, NC)
33. First Financial Bank (Cincinnati, OH)
34. First Hawaiian Bank (Honolulu, HI)
35. First Horizon Bank (Memphis, TN)
36. First Interstate Bank (Billings, MT)
37. First Midwest Bank (Itasca, IL)
38. First National Bank of Omaha (Omaha, NE)
39. Flagstar Bank (Troy, MI)
40. Fulton Financial (Lancaster, PA)
41. Glacier Bank (Kalispell, MT)
42. Great Western Bank (Sioux Falls, SD)
43. Hancock Bank (Gulfport, MS)
44. Heartland Financial (Dubuque, IA)
45. Independent Bank (McKinney, TX)
46. International Bancshares (Laredo, TX)
47. Investors Bank (Short Hills, NJ)
48. IBERIABANK (Lafayette, LA)
49. MB Financial (Chicago, IL)
50. MidFirst Bank (Oklahoma City, OK)
51. NBT Bank (Norwich, NY)
52. Northwest Bank (Warren, PA)
53. Old National Bank (Evansville, IN)
54. Pacific Premier Bank (Irvine, CA)
55. PacWest Bank (Beverly Hills, CA)
56. People's United Bank (Bridgeport, CT)
57. Pinnacle Bank (Lincoln, NE)
58. Popular Community Bank (New York, NY)
59. PrivateBank (Chicago, IL)
60. Provident Bank (Iselin, NJ)
61. Raymond James Bank (Saint Petersburg, FL)
62. Renasant Bank (Tupelo, MS)
63. Scottrade Bank (Saint Louis, MO)
64. Signature Bank (New York, NY)
65. Silicon Valley Bank (Santa Clara, CA)
66. Simmons Bank (Pine Bluff, AR)
67. South State Bank (Columbia, SC)
68. Sterling National Bank (Montebello, NY)
69. Stifel Bank & Trust (Saint Louis, MO)
70. Synovus Bank (Columbus, GA)
71. TCF Bank (Sioux Falls, SD)
72. Texas Capital Bank (Dallas, TX)
73. TowneBank (Portsmouth, VA)
74. Trustmark (Jackson, MS)
75. UMB Financial (Kansas City, MO)
76. Umpqua Bank (Roseburg, OR)
77. Union Bankshares (Richmond, VA)
78. United Bank (Glastonbury, CT)
79. United Community Bank (Blairsville, GA)
80. United Bankshares (Charleston, WV)
81. Valley National Bank (Wayne, NJ)
82. Webster Bank (Waterbury, CT)
83. WesBanco Bank (Wheeling, WV)
84. Wintrust Financial (Rosemont, IL)