

Establishment and Relocation of Branches and Offices

COMMENT LETTER

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September 16, 2025

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Jennifer M. Jones, Deputy Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
RIN 3064-AG10

Re: *Establishment and Relocation of Branches and Offices*

Dear Ms. Jones:

The Conference of State Bank Supervisors [1](#) (“CSBS”) provides the following comments on the Notice of Proposed Rulemaking (“proposal”) issued by the Federal Deposit Insurance Corporation (“FDIC”) entitled *Establishment and Relocation of Branches and Offices* (“proposal”). [2](#) CSBS supports the proposal as an important step to streamline and accelerate the processing of routine applications for establishing or relocating branches and offices.

Unnecessarily lengthy application processing times and unwarranted application delays impose avoidable operational uncertainty for banks and hamper their ability to meet customer needs. The proposed rule represents a significant step toward addressing these concerns. Specifically, the proposed changes to shorten processing timelines, expand which institutions are eligible for expedited application processing, and exclude *de minimis* branch facility changes from filing requirements are welcome improvements. These changes should also lead to more consistent treatment of applications across FDIC Regions.

State regulators also acknowledge recent improvements in the pace of FDIC branch application decisions. This is a positive trend that reflects the agency’s efforts to enhance efficiency while maintaining robust oversight. The proposed rule builds on this progress and demonstrates a thoughtful approach to improving regulatory responsiveness without compromising safety and soundness. As the FDIC continues this work, CSBS encourages close coordination with state regulators to promote consistency and transparency in application processing for state-chartered institutions. Clear and timely communication between the FDIC and the states also helps to limit unnecessary duplication, reduce delays, and ensure that application reviews remain appropriately risk-focused.

CSBS values the FDIC's ongoing partnership in supporting a supervisory framework that fosters competition, adaptability, and local accountability.

Sincerely,

Brandon Milhorn

President and CEO

- [1](#)

CSBS is the nationwide organization of state banking and financial regulators from all 50 states, the District of Columbia, and the U.S. territories.

- [2](#)

FDIC, Proposed Rule, [*Establishment and Relocation of Branches and Offices*](#), 90 Fed. Reg. 33898 (July 18, 2025).