KANSAS BANKERS ASSOCIATION

November 23, 2026

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

Re: RIN 3064-AG34, State Bank Parity ELECTRONICALLY FILED

Dear Ms. Jones:

The Kansas Bankers Association (KBA) strongly supports the Federal Deposit Insurance Corporation's proposed State Bank Parity rule. The KBA is a nonprofit trade association which has 181 of the 183 Kansas domiciled banks and thrifts in Kansas, as well as 23 out-of-state chartered banks doing business in the state, as members. This proposal is of significant importance to KBA member banks and the communities they serve.

The proposed rule appropriately reinforces Congress's intent in the Riegle-Neal Interstate Banking and Branching Efficiency Act to provide state banks with parity in interstate operations. Preserving a strong dual banking system requires that state-chartered banks be able to compete on equal footing with national banks when serving customers across state lines.

As banking services are increasingly delivered through digital channels rather than physical branches, regulatory protections should reflect how customers access financial services today. State banks should not face uncertainty or burdensome compliance obligations simply because they serve customers outside their home state through modern delivery channels. The proposed rule provides needed clarity regarding the scope of federal protections and will help ensure state banks can continue to compete, innovate, and meet customer needs nationwide.

KBA is particularly concerned by the growing number of state laws that seek to regulate the activities of out-of-state banks. Without clear federal standards, state-chartered institutions could face a patchwork of inconsistent requirements that increase costs, reduce efficiency, and limit access to banking services. The proposed rule appropriately addresses this uncertainty and will help preserve a consistent regulatory framework for interstate banking.

610 S.W. Corporate View 66615 | P.O. Box 4407 | Topeka, KS 66604-0407
Phone (785) 232-3444 | Fax (785) 272-7836 | www.ksbankers.com

For these reasons, KBA strongly supports the proposed rule and encourages the FDIC to finalize it without substantive changes.

Thank you for the opportunity to comment. Any questions or concerns should be directed to Terri Thomas at tthomas@ksbankers.com .

Sincerely,

Douglas E. Wareham, President & CEO
Kansas Bankers Association

Terri D. Thomas, JD, EVP-General Counsel
Kansas Bankers Association