

July 3, 2017

Laura A Rapp

Acting Assistant Regional Director
Federal Deposit Insurance Corporation
25 Jessie St at Ecker Square, St E. 2300
San Francisco, CA 94105



Subject: Banner Bank Responses to Customer Comments pertaining to the Proposed Closings of Branches located in Davenport and Uniontown, Washington

Dear Ms. Rapp:

On June 29, 2017, Shane Correa, Senior Vice President, Retail Banking Strategy/Market Development contacted customers and commenters [REDACTED], by phone, to discuss their concerns, as articulated in the two (2) separate addressed, but identical in verbiage comment letters remitted to the FDIC (undated) related to the proposed Davenport branch closure. Also on June 29, 2017, Shane contacted customer and commenter [REDACTED], by phone, to discuss concerns articulated in [REDACTED] June 5, 2017, FDIC comment letter related to the proposed Uniontown branch closure.

We are confident that we have resolved both customers/commenters [REDACTED] [REDACTED] issues to their satisfaction and consider both matters remediated to the greatest extent possible under the given circumstances. The proposed branch closings will proceed as planned and disclosed.

The following represents a synopsis of the Customer/Commenter's Issues, Banner Bank Findings and Responses, and Final Conclusions and Disposition:

Davenport, WA Branch

Customer/Commenter Issues [REDACTED]

1. Geographically inconvenient banking services accessibility-[REDACTED] want to bank in Davenport, WA only and will not utilize available online banking alternative delivery system.

Banner Bank Responses:

1. Shane spoke to [REDACTED] about the various banking options [REDACTED] could utilize after the Davenport Branch is closed. They discussed bank by mail, internet and mobile banking highlighting our snapshot deposit feature and the availability for cash withdrawals from any financial institution or credit union ATM free of charge. [REDACTED] appreciated the product offerings; however [REDACTED] does not trust internet technology and was not interested in any option discussed. [REDACTED] wants to bank local and plans to move [REDACTED] Banner relationship to Wheatland Bank where [REDACTED] have had an account for many years.
2. Shane discussed with [REDACTED] that both our Davenport Branch and Spokane 3rd & Steven's branch staff along with himself would be available to assist the [REDACTED] to ensure a

smooth transition. Shane thanked [REDACTED] for being a Banner client for more than 40 years as well as reiterating the bank's desire to continue as [REDACTED] primary bank of choice.

3. Shane provided his name and direct phone number for their future reference.
4. In addition, Shane's personal telephone call with the [REDACTED] covered the following topics:
 - a. Local staff support for their current branch banking needs, as well as help through the transition of [REDACTED] accounts to the Spokane 3rd & Stevens's branch.
 - b. A reminder that [REDACTED] account and routing numbers and any electronic debits, deposits and transfers will not change and continue uninterrupted; [REDACTED] can continue using [REDACTED] current checks, ATM and debit cards to access funds and conduct certain transactions at ATMs, should [REDACTED] retain [REDACTED] accounts with Banner Bank.
 - c. A statement of available non-mobile or online banking alternative banking delivery systems including telephone banking, and ATMs.
 - d. Name(s) and location(s) of the closest Non-Banner Bank branches in Davenport.

Bank Name	Address	Phone	Distance from Banner Bank
US Bank	626 Morgan St. Davenport, WA 99122	(509) 725-5011	33ft. away by walking 1 minute west on Morgan St
Wheatland Bank	600 Morgan St. Davenport, WA 99122	(509) 725-0211	190ft. away walking 1 minute east on Morgan St
Horizon Credit Union	1112 Morgan St. Davenport, WA 99122	(509) 725-0211	0.3 mi walking 5 minutes west on Morgan St

Conclusions and Disposition:

- [REDACTED] expressed [REDACTED] understanding of the scenarios and circumstances surrounding our decision to close the branch and also communicated [REDACTED] appreciation for receiving a personal phone call to discuss [REDACTED] concerns.
- We feel this matter has been satisfactorily resolved to the greatest extent possible given the circumstances.

Uniontown, WA Branch

Customer/Commenter Issue [REDACTED]

1. Inconvenient accessibility of banking services - [REDACTED] is sometimes without transportation and often walks to the branch to make frequent deposits [REDACTED]

Banner Bank Responses:

1. After gaining greater insight into [REDACTED] concerns, Shane learned that [REDACTED] works in Pullman, WA where Banner Bank has two (2) bank branches. [REDACTED] was aware of one (1) location, but not the other. Shane suggested that [REDACTED] use the convenient drive thru of the second location to make the deposits and [REDACTED] agreed that this presented a viable option.
2. Shane discussed with [REDACTED] that both our Uniontown and Pullman branch staff along with himself would be available to assist [REDACTED] to ensure a smooth transition. Shane thanked [REDACTED] for being a Banner client as well as reiterating the bank's desire to continue as [REDACTED] primary bank of choice.
3. Shane provided his name and direct phone number for [REDACTED] future reference.
4. In addition, Shane's personal telephone call with [REDACTED] included the following topics:

- a. Local Uniontown staff support for [REDACTED] current branch banking needs, as well as help through the transition of [REDACTED] accounts to the Pullman branch.
- b. A reminder that [REDACTED] account and routing numbers and any electronic debits, deposits and transfers will not change and continue uninterrupted; [REDACTED] can continue using their current checks, ATM and debit cards to access funds and conduct certain transactions at ATMs.
- c. A statement of available mobile and online banking alternatives including but not limited to telephone banking and ATMs.
- d. Locations of the closest Banner Bank branches in Pullman, WA.

Bank Name	Address	Phone	Distance from Banner Bank
Banner Bank	1300S Grand Ave, Pullman, WA 99163	(509) 334-4446	16 mi NW-20 minute drive from Uniontown branch
Banner Bank	300 E Main St, Pullman, WA 99163	(509) 332-1561	17 mi NW-23 minute drive from Uniontown branch

Conclusions and Disposition:

- [REDACTED] expressed [REDACTED] understanding of the scenarios and circumstances surrounding our decision to close the branch and also communicated [REDACTED] appreciation for receiving a personal phone call to discuss his concerns. In addition, Shane provided [REDACTED] a viable solution to maintaining accessibility to retail banking services with Banner Bank.
- We feel this matter has been satisfactorily resolved to the greatest extent possible given the circumstances.

Please contact me if you have questions or concerns regarding this matter or require additional information.

**Original Signature(s)
Removed for Confidentiality
and Compliance Purposes**

Cynthia, D Purcell
 Executive Vice President, Retail Banking and Administration Banner Bank
 10 S. First Avenue
 Walla Walla, WA 99362
 Direct ph. (509)526-8897

cc: P. Bonn Phillips- FDIC
 Roberta Hollinshead - Washington Department of Financial Institutions
 Mark Grescovich - Banner Bank

Enclosures:

- Client Complaint Letters
- Banner Branch Closure Client Notification Letters



FDIC

Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, California 94105

Division of Risk Management Supervision
San Francisco Regional Office
(415) 546-0160

June 15, 2017

Mark J. Grescovich
Chief Executive Officer
Banner Bank
300I 112th Avenue, Suite 200
Bellevue, Washington 98004

Subject: Consumer comments pertaining to the Proposed Closing of Branches located in
Davenport and Uniontown, Washington

Dear Mr. Grescovich:

Enclosed is a copy of 3 comments the FDIC received about the proposed closing of the bank's branch offices located in Davenport and Uniontown, Washington. Please investigate the issues raised in the comments and advise us of your findings in the form of a written response with copies of all pertinent documentation, including but not limited to, applicable disclosures and evidence that the concerns have been addressed (if applicable). If you respond directly to the commenters, please include a copy of the responses with the findings of your review.

Your response to the FDIC could be released under the Freedom of Information Act, in full under the Privacy Act, or when we determine the information provided, in whole or in part, may assist in explaining the situation.

Please provide your written response on bank letterhead within 20 calendar days from receipt of this letter. Please contact me or Senior Case Manager P. Bonn Phillips at (415) 546-0160 if you have any questions.

Sincerely,

**Original Signature(s)
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and Compliance Purposes**

Laura A. Rapp
Acting Assistant Regional Director

cc: Roberta Hollinshead
Washington Department of Financial Institutions

Enclosures

Federal Deposit Insurance Corporation

25 Jessie Street@ Ecker Square

Suite2300

San Francisco, Ca. 94105-2780

To Whom It May Concern;

RE: Closing of the Banner Bank at 639 Morgan Street in Davenport, WA.

I hear that you plan to close this bank and move our accounts to 508 W. 3rd Ave. in lovely downtown Spokane. Making my banking practices EXTREMELY INCONVIANT. I have several accounts and a safe deposit box at the Davenport location. AND have had for over 40 years. My business WILL NOT be leaving Davenport so if you insist on closing this branch we will be moving our accounts to one of the other 2 banks, INDAVENPORT.

For me, that is a 110 mile round trip just to do my banking. I don't think so! And don't even suggest that I bank online. IT WILL NOT BE HAPPENING!

PLEASE RECONSIDER your plan, since obviously the CUSTOMER and how best to serve us was not part of **your careful evaluation in coming to this decision.**

Sincerely,

A loyal customer at this location (even if it has been under numerous names)

**Original Signature(s)
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For me, that *is* a 110 mile round trip just to do my banking. I don't think so! And don't even suggest that I bank online. IT WILL NOT BE HAPPENING!

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June 5, 2017

Good Day Banner Bank,

I am writing you for the purpose of expressing my utter disappointment in your planned
closure of the Uniontown WA 99179, branch of your bank. [REDACTED]

[REDACTED] I just walked to the branch this morning to make a deposit. [REDACTED]

[REDACTED] Closure if the Uniontown branch will cause me a VERY distasteful
inconvenience! PLEASE do not close this branch! I enjoy the people who work there and walking
there to do my banking business is a high point in my day. It's a twenty mile trek to the next
closest branch.

Please reconsider and cancel the closure of the Uniontown WA 99179 branch of your bank!

Sincerely,

**Original Signature(s)
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[REDACTED]

[REDACTED]

[REDACTED]