

November 30, 2016

The Honorable Paul Ryan  
Speaker of the House  
Washington, D.C. 20515

The Honorable Nancy Pelosi  
Minority Leader  
Washington, D.C. 20515

Dear Speaker Ryan and Minority Leader Pelosi:

The undersigned state bankers associations, representing banks of all sizes from across the country, write to express our support for H.R. 6392, the Systemic Risk Designation Improvement Act of 2016, scheduled for consideration on the House floor on Thursday, December 1.

This bipartisan legislation, introduced by Representative Blaine Luetkemeyer (R-MO), changes the automatic designation of financial institutions as "systemically important" solely based on asset size. The bill would accomplish this by giving the Financial Stability Oversight Council (FSOC) the authority to subject a bank holding company to enhanced supervision and prudential standards by the Federal Reserve System, if the FSOC makes a determination that either material financial distress at the bank holding company, or the nature, scope, size, scale, concentration, interconnectedness, or mix of its activities, could threaten the financial stability of the United States.

Asset based regulation is arbitrary and meaningless. We believe regulation more appropriately tailored to the business model of an institution is a common sense and long overdue solution. We urge members to support H.R. 6392.

Respectfully,

Alabama Bankers Association  
Alaska Bankers Association  
Arizona Bankers Association  
Arkansas Bankers Association  
California Bankers Association  
Colorado Bankers Association  
Connecticut Bankers Association  
Delaware Bankers Association  
Florida Bankers Association  
Georgia Bankers Association  
Hawaii Bankers Association  
Idaho Bankers Association  
Illinois Bankers Association  
Illinois League of Financial Institutions  
Indiana Bankers Association  
Iowa Bankers Association  
Kansas Bankers Association  
Kentucky Bankers Association  
Louisiana Bankers Association

Maine Bankers Association  
Maryland Bankers Association  
Massachusetts Bankers Association  
Michigan Bankers Association  
Minnesota Bankers Association  
Mississippi Bankers Association  
Missouri Bankers Association  
Montana Bankers Association  
Nebraska Bankers Association  
Nevada Bankers Association  
New Hampshire Bankers Association  
New Jersey Bankers Association  
New Mexico Bankers Association  
New York Bankers Association  
North Carolina Bankers Association  
North Dakota Bankers Association  
Ohio Bankers League  
Oklahoma Bankers Association  
Oregon Bankers Association  
Pennsylvania Bankers Association  
Puerto Rico Bankers Association  
Rhode Island Bankers Association  
South Carolina Bankers Association  
South Dakota Bankers Association  
Tennessee Bankers Association  
Texas Bankers Association  
Utah Bankers Association  
Vermont Bankers Association  
Virginia Bankers Association  
Washington Bankers Association  
West Virginia Bankers Association  
Wisconsin Bankers Association  
Wyoming Bankers Association