

June 22, 2012

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Re: Proposed Rulemakings for an Integrated Regulatory Capital Framework

Ladies and Gentlemen:

The American Bankers Association (ABA)¹ and The Financial Services Roundtable (Roundtable)² are writing to request an extension of the comment period for the three notices of proposed rulemaking³ that would revise and replace the current capital rules of the Board of Governors of the Federal Reserve, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation (collectively the “banking agencies”). These proposals represent the first opportunity for the American banking industry as a whole to see and review the approach being taken by the banking agencies to bank capital standards developed by the international Basel Committee, and more importantly, the first chance to consider, measure, and evaluate how the proposals will affect their ability to continue to provide the financial services that their customers and communities rely on. These proposals would be the most material changes to U.S. capital standards since 1989 and will have significant immediate and ongoing impact on the nature of financial services in the United States. Due to the broad scope of the proposals and their applicability to all business lines across all banks, bankers need sufficient time to evaluate the operational complexities of the proposals and understand their significant impact. We are concerned that the comment period, scheduled to end on September 7, 2012, does not provide sufficient time to examine

¹ The American Bankers Association represents banks of all sizes and charters and is the voice for the nation’s \$14 trillion banking industry and its 2 million employees. The majority of ABA’s members are banks with less than \$165 million in assets. Learn more at www.aba.com.

² The Financial Services Roundtable represents 100 of the largest integrated financial services companies providing banking, insurance, and investment products and services to the American consumer. Member companies participate through the Chief Executive Officer and other senior executives nominated by the CEO. Roundtable member companies provide fuel for America’s economic engine, accounting directly for \$92.7 trillion in managed assets, \$1.2 trillion in revenue, and 2.3 million jobs.

³ The proposals are titled: *Regulatory Capital Rules: Regulatory Capital, Implementation of Basel III, Minimum Regulatory Capital Ratios, Capital Adequacy, and Transition Provisions*; *Regulatory Capital Rules: Standardized Approach for Risk-weighted Assets*; *Market Discipline and Disclosure Requirements*; and *Regulatory Capital Rules: Advanced Approaches Risk-based Capital Rules; Market Risk Capital Rule*.

adequately the implications and impact of the proposals and to provide comments reflecting the information that the agencies will need to make fully informed judgments.

All banks will find providing effective comments within the comment period challenging given other domestic and international proposals requiring evaluation and comment over the same period. Smaller, less complex banks do not have designated staff to review the banking agencies' proposals. As a result, their review of the capital proposals has to compete for bank staff time with day-to-day bank operations. Therefore, ABA and the Roundtable respectfully request that the banking agencies consider extending the current September 7, 2012, comment period deadline for at least an additional 90 days.

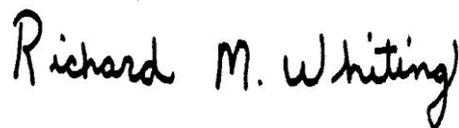
Moreover, we expect that a reasonable amount of time will be required to reach out to the banking industry to alert it to the broad applicability of the proposals.⁴ Since the banking agencies adopted Basel I in 1989, most of the conversation on capital has been focused on our larger members. Thus, during the extended comment period, every effort needs to be made to inform all participants in the banking industry that the capital proposals will have significant implications for *all* banks. We appreciate the summaries provided by the banking agencies that highlight the community bank impact as an important first step, but the summaries alone cannot form the basis for banker review of the details of the proposals to give the informed comment that the agencies will need. We urge the banking agencies to continue to highlight these proposals' implications to banks of all sizes through an aggressive industry outreach program. Please let us know how we can help in this outreach.

Thank you for considering our request. Please feel free to contact Hugh C. Carney at hcarney@aba.com or 202.663.5324 or Richard Foster at richard.foster@fsround.org or 202.589.2424 to discuss this request further or answer any questions you may have.

Sincerely,



Hugh C. Carney
Senior Counsel
American Bankers Association



Richard M. Whiting
Executive Director & General Counsel
The Financial Services Roundtable

⁴ We note that, although the proposal was adopted by the banking agencies in mid-June, it has still not been published in the Federal Register—the designated publication for public notice of any federal regulatory proposals.