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October 14, 2009

Office of the Comptroller of The
Currency
250 E Street, SW
Mail Stop 2-3
Washington, DC 20219

Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Jennifer J. Johnson
Secretary
Board of Governors of the
Federal Reserve System
20th Street and Constitution Ave., NW
Washington, DC 20551

Regulation Comments
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552

Re: Correspondent Concentration Risks Proposed Guidance; OCC Docket ID OCC-2009-0013; FRB Docket No. OP-1369; OTS Docket ID OTS-2009-20016; 74 Federal Register 48955; September 25, 2009

Ladies and Gentlemen,

The American Bankers Association¹ respectfully requests that the agencies extend for an additional 30 days the period provided for public comment on the agencies' notice of proposed guidance concerning correspondent concentration risks.

We have heard from several of our members that the guidance has the potential to increase burden significantly on the entire banking industry. Several bankers' banks are attempting to calculate the credit and funding exposures that their members have to the bankers' banks, applying the proposed guidance as if it already were adopted. Once those calculations are complete, the bankers' banks plan to contact their members to discuss the proposal's impact. However, the bankers' banks point out that resources within the client banks already are stretched very thin on preparing the third quarter Call Report and Thrift Financial Report, among other things.

¹ The ABA brings together banks of all sizes and charters into one association. The ABA works to enhance the competitiveness of the nation's banking industry and strengthen America's economy and communities. Its members – the majority of which are banks with less than \$125 million in assets – represent over 95 percent of the industry's \$14 trillion in assets and employ more than two million men and women.

While our members agree that correspondent concentrations must be managed carefully, they, like the banking agencies, want to ensure that the guidance strikes the appropriate balance after considering its likely benefits and burdens. Our members believe they will be able to provide more meaningful input into both with additional time and that such input would be valuable in assisting you in your efforts to evaluate the proposal's merits.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark J. Tenhundfeld". The signature is fluid and cursive, with the first name "Mark" being the most prominent.

Mark J. Tenhundfeld