

From: Commerce Bank, Michael Bude
Proposal: 1492 (RIN7100-AE20) - Reg Y & YY - Amendments to the Capital Plan and Stress Test Rules
Subject: Amendments - Capital Plan and Stress Test Rules

Comments:

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Proposal: Regulations Y and YY: Amendments to the Capital Plan and Stress Test Rules [R-1492]

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Your comment: Regulations Y and YY; Docket No. 1492 Amendments to the Capital Plan and Stress Test Rules Commerce Bancshares, Inc. (Commerce) is a super community regional bank with \$22 billion in assets offering an array of sophisticated financial products and traditional banking services mainly in the mid-west - Missouri, Kansas, Illinois, Oklahoma, and Colorado. We appreciate the opportunity to comment on the Stress Test Amendment proposal. We support the proposed amendment, for BHC's with assets between \$10-50 billion, to shift the timing forward by one calendar quarter such that the stress test cycle would begin January 1 and final submission would be required by July 31. Significant resources required for stress testing are largely freed from budgeting and planning for the following year by January.