March 20, 2007

The Honorable Ben. S. Bernanke Chairman Board of Governors of the Federal Reserve System 20th Street and Constitution Ave, N.W. Washington, DC 20551	The Honorable John M. Reich Director Office of Thrift Supervision 1700 G Street, N.W. Washington, DC 20552
The Honorable Sheila C. Bair Chairman Federal Deposit Insurance Corporation 550 17th Street, N.W. Washington, DC 20429	The Honorable John C. Dugan Comptroller Office of the Comptroller of the Currency 250 E Street, S.W. Washington, DC 20219

Re: Notice of Proposed Rulemaking on Risk-Based Capital Standards: FRB Docket Nos. R-1261 and R-1238; OCC Docket Nos. 06-09 and 06-15; FDIC RIN 1550-AB56 and 3064-AC96; OTS Nos. 2006-33 and 2006-49.

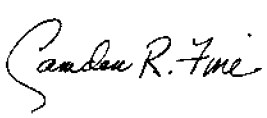
Dear Chairman Bernanke, Comptroller Dugan, Chairman Bair, and Director Reich:

In the Basel II NPR and the Basel IA NPR, you requested comment on whether U.S. banks, regardless of their asset size, should be given the option of a "U.S. version" of the standardized approach for Basel compliance. We strongly support such an option, and urge you to issue a standardized option for public comment as soon as possible.

We also respectfully recommend that the "U.S. version" of the standardized approach be substantially similar to the international version of the standardized approach, and that this option be finalized on the same schedule as the Basel II and Basel IA rules.

Additionally, we support the opt-in approach under Basel IA, which would allow non-mandatory Basel II banks to continue using the existing Basel I risk-based capital rules or Basel IA if they choose to do so.

Sincerely,



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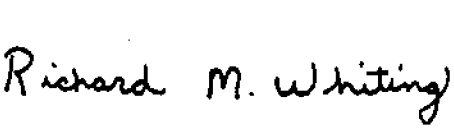

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