

From: Michael G Lewis
Proposal: 1401 (RIN 7100-AD61)(Ver 2) -Reg H & Y Risk-Based Capital; Alternatives to Credit Ratings for Debt &
Subject: Reg H & Y Risk-Based Capital Guidelines

Comments:

Date: Dec 13, 2011

Proposal: Regulation H and Y - Risk-Based Capital Guidelines: Market Risk;
Alternatives to Credit Ratings for Debt and Securitization Positions - Version 2
Document ID: R-1401
Document Version: 2
Release Date: 12/07/2011
Name: Michael G Lewis
Affiliation:

Comments:

A moderate rate itself is of high value in this time of rapid change. That high value should be interpreted as having a monetary equivalent. Then it would be valuable for people to cultivate moderate rates of economic change. The transition (the sudden change from ancient primitive superstition and ignorance to the suddenly modern post-Apollo secular concept of the Earth) changed everything in the million-year evolutionary time scale and it is likely that powerful changes will be taking place in civilizations everywhere on Earth for a very long time-certainly, centuries. A monetary value for moderate rates of change might emerge from new long-term legislation, or from long term systems already existing. It is like placing a value on electrical power, which is the rate of change of electrical energy. Or, a value on electrical energy, which is the rate of change of electrical activity.