

From: Brian M. Wells

Subject: Reg Y

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Comments:

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Proposal: Regulation Y - Definitions of Predominantly Engaged In Financial Activities and Significant Nonbank Financial Company and Bank Holding Company

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Name: Brian M Wells

Affiliation:

Category of Affiliation:

Address:

City:

State:

Country:

Zip:

PostalCode:

Comments:

I think that this definition is too narrow, it should be based on the size of a companies derivative positions, and should not take into account how large a portion of revenues are from finance operations. Companies like GE (and its GE Capital Division) have a gigantic stake in the derivatives market, and shouldn't be ignored just because they also make money in other ways.