

From: Chris Barnard  
Proposal: 1425 (RIN 7100-AD77) - Reg Y - Capital Plans  
Subject: Capital Plans

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Comments:

Date: Jun 26, 2011

Proposal: Capital Plans  
Document ID: R-1425  
Document Version: 1  
Release Date: 06/10/2011  
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Dear Jennifer Johnson. Thank you for giving us the opportunity to comment on your Proposed Rule: Capital Plans, Docket No. R-1425. I support the proposals, which require large bank holding companies to submit robust, forward-looking capital plans to the Federal Reserve on an annual basis. The proposals are outwith Dodd-Frank, but are entirely appropriate in order to enhance the soundness of the banking system and the wider economy. Proposed § 225.8(d)(3) on data collection is particularly important, as this will allow you to undertake a broader and more organic qualitative analysis of bank holding companies' financial condition going forward. In answer to your specific question, the proposed rule should not allow a transitional period for institutions that did not participate in the CCAR. Any decent management should already be prepared for this type of exercise. Yours sincerely, Chris Barnard