



March 22, 2012

Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, D.C. 20551

Re: Request for Comment on Enhance Prudential Standards and Early Remediation
Requirements for Covered Companies
Docket No. 1438
RIN 7100-AD-86

Dear Ms. Johnson,

I am writing to provide commentary on behalf of IBERIABANK regarding the Stress Testing rules proposed by the Federal Reserve Bank as well as other regulatory agencies. We realize that a great deal of effort has been put forth by the agencies as well as bankers across the country toward the goal of restoring confidence in our financial system. It is our hope and expectation that such efforts will meet with success as absent a significant restoration of this confidence, we, like you, feel that a meaningful sustained recovery will be difficult if not impossible to achieve.

While we can agree on the objectives set forth in conducting the stress testing, we respectfully disagree with the proposed level of detailed financial information to be disclosed to the public. We view the requirement to perform stress testing as simply another form of examination conducted by the agencies, not unlike those we undergo for other risk management disciplines important to our industry such as credit underwriting and management, consumer compliance with all its attendant regulatory requirements, internal audit and operational risk exposure, capital management, liquidity and market risk management, as well as other specialized examinations. In no case are the examination findings disclosed to the public. In fact, it is a violation of law to do so. In our view, disclosing the general terms of the scenarios to be tested and whether the bank in question passed the test or not would be sufficient to achieve the objective

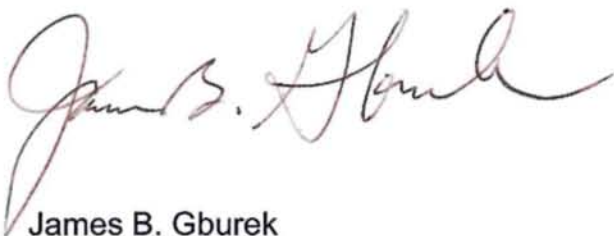
March 22, 2012
Jennifer J. Johnson
Page 2

of restoring confidence in the safety and soundness of our banking system, since such tests would have been prescribed and inspected by the regulatory agencies.

Another objection that we have to the detailed level of financial disclosure that the proposed rules will permit is that such disclosure will be tantamount to providing earnings guidance, a practice which by and large has been discontinued by many publicly traded companies. In addition, public disclosure of information at a detailed level may in fact unintentionally provide confidential and strategic information to our competitors, which could in turn contribute to a financial performance that is less than optimal, thereby defeating the purpose for conducting the tests in the first place. Anything that might interfere with our ability to create and enhance shareholder value cannot be deemed to be supportive of the objective of restoring confidence in the health of our financial system.

Thank you very much for allowing us to comment on the proposed stress testing rules. It is our hope that our feedback, as well as those received from other financial institutions will provide sufficient impetus to rewrite the rules to not permit/require the level of detailed public disclosure as currently proposed.

Sincerely,

A handwritten signature in dark ink, appearing to read "James B. Gburek". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

James B. Gburek
Executive Vice President
Chief Risk Officer

Cc Daryl Byrd
Robert Worley
Barry Berthelot