

From: S. Ray  
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

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Comments:

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Proposal: Regulation H and Y - Risk-Based Capital Guidelines: Market Risk;  
Alternatives to Credit Ratings for Debt and Securitization Positions - Version 2  
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Comments:

When I look at my brokerage statement on a daily basis, there are 3 categories:  
1) securities owned 2) funds available for withdrawal 3) funds in a money market account. I choose not to "trade on margin". So, in the recent debacle with the Global MF company, evidently there was a fourth category: 4) funds that may not be available because we have stolen them