

Oregon, Washington, and Idaho Bankers Associations
Regulations H, Q, and Y
Docket No. R-1442
Regulatory Capital Rules

On September 18, 2012, members of the Oregon, Washington, and Idaho Bankers Associations met with Governor Elizabeth Duke to discuss proposed amendments to the joint notice of proposed rulemaking on regulatory capital requirements. Association members expressed concerns about the complexity of the proposed rules and the effect on banks' ability to raise capital. Association members also commented on specific aspects of the proposal, including the application of certain risk weights, particularly for mortgage assets, and uncertainty about the grandfathering of certain capital instruments. Overall, association members said the proposed new requirements would likely discourage bank lending, and they cautioned against a hasty implementation of the proposed rules without fully considering the consequences.