

From: First Security Bank, Ben Hillesheim
Proposal: 1442 (RIN 7100-AD 87) Regs H, Q, & Y Regulatory Capital Rules
Subject: Regs H & Y Regulatory Capital Proposals

Comments:

RE: Availability of Basel III Capital Estimation Tool

The level of capital isn't the biggest issue. It is the work it takes to do the capital calculation. The cost benefit simply doesn't work.

Subject: Availability of Basel III Capital Estimation Tool

On September 24, the Federal Reserve Board, the Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency announced the availability of a regulatory capital estimation tool to help community banking organizations and other interested parties evaluate recently published regulatory capital proposals. The tool will assist these organizations in estimating the potential effects on their capital ratios of the agencies' Basel III Notice of Proposed Rulemaking (NPR) and Standardized Approach NPR.

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