

New Jersey Bankers Association
Regulations H, Q, and Y
Docket No. R-1442
Regulatory Capital Rules

On June 27, 2012, members of the New Jersey Bankers Association met with Governor Daniel Tarullo to discuss the proposed interagency regulatory capital rules. Association members were concerned that the proposed rulemaking might not adequately consider the specific functions and needs of both mutual holding companies and savings and loan holding companies. Association members also noted concerns regarding the inclusion in tier 1 capital of unrealized gains and losses on available-for-sale securities, as well as about the elimination of trust preferred securities from inclusion in additional tier 1 capital.