

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

On September 25, 2012, members of the Pennsylvania Bankers Association met with Governor Elizabeth Duke to discuss the joint notice of proposed rulemaking on regulatory capital requirements, which would implement provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Basel III regulatory capital reforms. Association members had concerns about the complexity of the proposed rules and their potential cost and compliance burden for community banks. Association members also expressed concerns about how the proposed risk weights for residential mortgages would affect banks' risk management. They also said the proposal would increase the cost of capital for banks and thus would hinder the growth of new and existing community banks.