

From: Louisiana Bankers Association, Robert T. Taylor
Proposal: 1460 (RIN7100-AD99) Regulatory Capital Rules: Enhanced Supplementary Leverage Ratio Standards for BH
Subject: Reg H & Q - Regulatory Capital Rules

Comments:

October 25, 2013

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
400 7th Street, SW
Suite 3E-218, Mail Stop 9W-11
Washington, DC 20219

Mr. Robert de V. Frierson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Re: Regulatory Capital Rules: Regulatory Capital, Enhanced Supplementary Leverage Ratio Standards for Certain Bank Holding Companies and Their Subsidiary Insured Depository Institutions, OCC Docket ID OCC-2013-0008, Federal Reserve Docket No. R-1460, FDIC RIN 3064-AE01

Dear Ladies and Gentlemen:

The Louisiana Bankers Association appreciates the opportunity to comment on the proposed regulatory capital requirement titled Regulatory Capital Rules: Regulatory Capital, Enhanced Supplementary Leverage Ratio Standards for Certain Bank Holding Companies and Their Subsidiary Insured Depository Institutions. This proposal seeks to strengthen the leverage ratios for the largest interconnected, systemically important financial institutions by introducing a two percent leverage buffer on the largest bank holding companies and six percent supplementary leverage ratio for their subsidiary financial institutions to be considered well capitalized under prompt corrective action requirements. These new measures of capital adequacy are in response to the framework introduced by the Basel Committee on Banking Supervision (BCBS), which intends to strengthen capital levels for the global systemically important banking organizations.

LBA supports this proposal as a much needed improvement in capital standards for the eight institutions that remain too-big-to-fail. The U.S. economy continues to be at risk due to these under capitalized banks. In a September 23, 2013 speech, Federal Reserve Bank of Dallas President, Richard Fisher, said, "We at the Dallas Fed believe, based on the experience of the last five years, that the largest financial institutions are a dagger pointed at the heart of our economy." This proposed rule is a step in the right direction.

Sincerely,

Robert T. Taylor
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