February 26, 2014

Office of the Comptroller of the Currency
Legislative and Regulatory Activities Division
400 7th Street SW
Suite 3E-218, Mail Stop 9A-11
Washington, DC 20219
Docket Number OCC-2013-0016

Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
Attn.: Comments, Robert E. Feldman,
Executive Secretary
RIN 3064-AE04

Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
Attn.: Robert de V. Frierson
Docket No. R-1466

Re: Proposed Liquidity Coverage Ratio Requirement

Dear Sir or Madam:

The undersigned appreciate the opportunity to comment on the proposed liquidity coverage ratio ("LCR") regulations issued by the Office of the Comptroller of the Currency (the "OCC"), the Board of Governors of the Federal Reserve System (the "Board") and the Federal Deposit Insurance Corporation (the "FDIC" and, together with the OCC and the Board, collectively, the "Agencies") entitled "*Liquidity Coverage Ratio: Liquidity Risk Measurement, Standards and Monitoring*" (the "Proposed Rule").[1]

We refer you to the comment letter on the Proposed Rule dated today's date (the "SFIG/SIFMA Comment Letter") from The Structured Finance Industry Group and the Securities Industry and Financial Markets Association. More specifically, we refer you to Part IA of the SFIG/SIFMA Comment Letter that requests "look through" treatment for a subset of securitization facilities (defined in the SFIG/SIFMA Comment Letter as "bank customer securitization credit facilities") that provide a necessary and efficient funding source for the real economy.

Each of the undersigned is a user of a bank customer securitization credit facility. As described in the SFIG/SIFMA comment letter, these facilities are an important part of our financing of extensions of credit to our customers that we make as a core part of our businesses. We value these facilities because (i) they are among our least expensive sources of funding, (ii) allow us to secure funding based upon the credit quality of the assets that we originate, thereby further

1 See http://www.gpo.gov/fdsys/pkg/FR-2013-11-29/pdf/2013-27082.pdf.

diversifying our funding sources, and (iii) allow banks to diversify what would otherwise be their credit exposure to us through funding obtained based upon asset credit quality.

A 100% outflow amount is applied to bank customer securitization credit facilities under the Proposed Rule notwithstanding that these facilities are established as substitutes for, or complements to, traditional secured and unsecured revolving credit facilities and are often drawn on in much the same manner and in the same amounts as the facilities for which they act as substitutes. Bank customer securitization credit facilities should therefore be assigned the same outflow amounts under the LCR regulations as undrawn credit commitments extended directly to us. Incremental funding requests under these facilities are driven by our borrowing needs in much the same manner as incremental funding requests under traditional revolving credit facilities. For both traditional revolving credit facilities and bank customer securitization credit facilities, the decision to borrow is initiated by us.

We are concerned that applying a 100% outflow amount to undrawn credit commitments under bank customer securitization credit facilities could impact the availability or pricing of these facilities, thus curtailing our ability to provide cost effective financing to our customers and negatively impacting our ability to diversify the funding of our daily business, invest in new growth initiatives and create jobs.

We therefore respectfully ask that the Agencies provide "look through" treatment for bank customer securitization credit facilities as requested in the SFIG/SIFMA Comment Letter.

Respectfully Submitted,

Seaco Asia Pte Ltd.

The Hershey Company