

From: Tyler J. Krutzfeldt
Proposal: 1479 (RIN 7100-AE10) Regulation: Physical Commodities-FHCs (ANPR)
Subject: Physical Commodities-FHCs

Comments:

FHC's can remain in the commodity business by underwriting loans, leases, & securities for traditional commodity merchants & producers. Taking physical commodity risk is not the business of banking.

It is entirely rationale for the Fed to take "environmental catastrophic risk" and its associated reputational risk off the balance sheet of FHC's. Numerous private capital sources are available to take physical risk, from integrated oil & gas companies to farmer-owned cooperatives. These entities are often backed by community banks and FHC's alike.

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