

May 13, 2016

Submitted Electronically

Mr. Robert deV. Frierson,
Secretary
Board of Governors of the Board System
20th Street and Constitution Avenue N.W.
Washington, DC 20551

Re: Risk-Based Capital Guidelines: Implementation of Capital Requirements for Global Systemically Important Bank Holding Companies; 81 Federal Register 20579 (April 8, 2016) Docket No. R-1535; RIN 7100 AE-49

Dear Sir:

The American Bankers Association¹ (ABA) appreciates the opportunity to comment on the proposed clarifications to the Federal Reserve Board's (Board) rule regarding risk-based capital surcharges for U.S. based global systemically important bank holding companies (GSIB surcharge rule). The Proposal would modify the GSIB surcharge rule to provide that a bank holding company subject to the rule would continue to calculate its method 1 and method 2 GSIB surcharge scores annually using data as of December 31 of the previous calendar year, even though the data will be due quarterly beginning with the June 30, 2016, report. The FR Y-15 is the basis for the calculation and reporting of the GSIB surcharge. The FR 2052a provides the underlying data for FR Y-15 Schedule G, which is the basis for the method 2 calculation of the GSIB surcharge rule. Firms with \$50 billion in assets and above are required to file the FR Y-15 and FR 2052a.

We appreciate the Board's clarifications on the timing of calculations for firms covered by the GSIB surcharge rule. We note, however, that the transition periods for FR Y-15 Schedule G and FR 2052a, are not aligned for the subset of covered U.S. BHCs with total assets equal to or greater than \$50 billion, but less than \$250 billion. Currently, these firms are transitioning into the FR 2052a and so are not required to file the report until June 30, 2017.² Schedule G, however, is required as of the December 31, 2016, reporting period.³ Because FR 2052a provides the base data for Schedule G, requiring smaller firms to file Schedule G seven months prior to submitting FR 2052a negates the necessary transition time provided under FR 2052a.

Under the recent changes to FR Y-15 and FR 2052a, the Board appropriately recognized and acknowledged the need to tailor the reporting to the size and complexity of the firms covered under the reports. ABA very much supports this approach and believes that the transition

¹ The American Bankers Association is the voice of the nation's \$16 trillion banking industry, which is composed of small, regional and large banks that together employ more than 2 million people, safeguard \$12 trillion in deposits and extend more than \$8 trillion in loans.

² 80 FR 71795

³ 80 FR 77344

timelines for the reports should be better aligned. We urge the Board to lengthen the transition period for Schedule G for these firms, making it effective for the December 31, 2017, FR Y-15 reporting period. This would allow smaller covered BHCs to build and refine their 2052a reporting systems before using them as the basis for Schedule G of the FR Y-15.

If you have any questions about these comments, please contact the undersigned at (202) 663-5187 or email: atouhey@aba.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Alison Touhey". The signature is fluid and cursive, with a long horizontal stroke at the end.

Alison Touhey
Senior Regulatory Advisor