

October 10, 2019

Ann E. Misback  
Secretary  
Board of Governors of the Federal Reserve System  
20th Street & Constitution Ave., NW  
Washington, DC 20551  
E-mail: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)

Re: *Request for Extension*: Regulatory Capital Rules: Risk-Based Capital Requirements for  
Depository Institution Holding Companies Significantly Engaged in Insurance Activities

Docket No. R-1673 and RIN 7100 AF 56

Dear Ms. Misback:

Most of the insurance-led depository institution holding companies are members of NAMIC and they would be directly subject to the Notice of Proposed Rulemaking (the Proposal) on risk-based capital requirements for depository institution holding companies significantly engaged in insurance activities. Specifically, we are writing to request an extension of 90 days be granted to the original 60-day comment period. This would result in a revised comment deadline of February 4, 2020.

We greatly appreciate the good work on the Proposal and the coordination with the NAIC. It is critical to companies subject to the BBA. But equally important is the precedent set by the Proposal in support of an aggregation approach to consolidated group capital.

Because the Proposal are so significant, we want to be sure to provide fulsome comments that reflect our views on the comparison of the Proposal to the ICS and the NAIC Group Capital Calculation. To provide feedback that adequately addresses the complex international system of group capital proposals, NAMIC and its members need more time. We respectfully request an additional 90 days beyond the current deadline of November 6, 2019.

Thank you for your consideration of our request. We look forward to a continued dialogue on this important rulemaking. Please do not hesitate to contact me with any questions regarding these comments.

Sincerely,



*Jonathan Rodgers*

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National Association of Mutual Insurance Companies