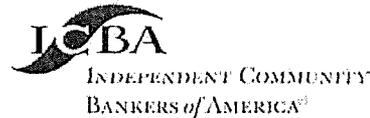
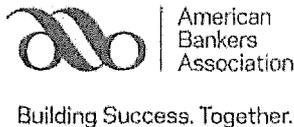
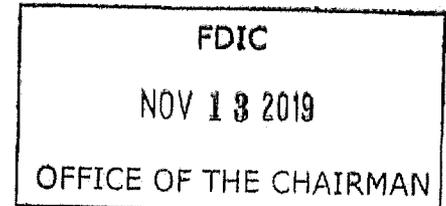


OC19-236



November 13, 2019

The Honorable Jelena McWilliams
Chairman
Federal Deposit Insurance Corporation
550 17th Street
Washington, DC 20049



The Honorable Randal K. Quarles
Vice Chairman for Supervision
Board of Governors of the Federal Reserve System
Eccles Building
20th and C St. NW,
Washington, DC 20219

Dear Chairman McWilliams and Vice Chairman Quarles:

The American Bankers Association (ABA) and the Independent Community Bankers of America appreciate the request of Federal Deposit Insurance Corporation and Federal Reserve Board for information (RFI) on the Uniform Financial Institutions Rating System (UFIRS), also known as CAMELS. The agencies are seeking information and comments on the consistency of ratings assigned by the agencies and the current use of CAMELS ratings by the agencies in their bank application and enforcement action processes, and related questions.

We look forward to responding to the RFI. However, we believe that the proposed comment deadline of 60 days is insufficient to enable a full and adequate response to a matter of this importance. The insufficiency is particularly pronounced when considering that the comment period falls at the end of the year, when many key experts within our member institutions will be involved with end-of-the year activities, not to mention holiday issues.

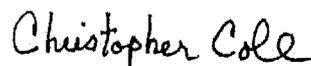
Therefore, we respectfully recommend that the agencies extend the comment period by 60 days, to February 28, 2020. We believe this additional time will allow the banking industry and other interested public parties, to provide more ample comment and help ensure that the agencies receive and employ the highest quality information as they review the CAMELS rating system.

Sincerely,



Alison Touhey
American Bankers Association

Sincerely,



Christopher Cole
Independent Community Bankers of America