

Proposal: 1741(AG 11) Reg Q - Regulatory Capital Rule: Emergency Capital Investment Program

Description:

Comment ID: 138112

From: BOM, Katrice Below

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Subject: Reg Q; Regulatory Capital Rule: Emergency Capital Investment Program

Comments:

NONCONFIDENTIAL // EXTERNAL

To Whom it May Concern:

My name is Katrice R. Below, Vice President and Commercial Lender at BOM Bank. Our bank is a CDFI bank, located in rural areas throughout Louisiana and Texas.

I am very excited about the ECIP Bill and what this could mean for many of our customers and non-customers.

This program would allow us to extend even more help to many people in the areas we serve, including many minorities and low/moderate income households.

The only problem is that BOM Bank is a Subchapter S corporation and the funds we would get would be considered Subordinated Debt and not Preferred Stock.

I am asking the Federal Reserve to exclude ECIP Subordinated Debt from counting towards the Federal Reserve Debt to Equity ratios just as they did with TARP.

In good business,

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