

Proposal: 1786 (AG44) Resolution Related Resource for Large Banking Organizations

Description:

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Comment ID: 142561

From: Scott

Proposal: 1786 (AG44) Resolution Related Resource for Large Banking Organizations

Subject: Resolution-Related Resource Requirement for Large Banking Organizations

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Comments:

NONCONFIDENTIAL // EXTERNAL

I disagree with the proposal entitled "Resolution-Related Resource Requirements for Large Banking Organizations" Docket No. R-1786 and RIN 7100-AG44 / 3064-AF86. Banks at risk of bankruptcy should not be required to sell long term debt (e.g., bonds) for the purpose of absorbing losses. (See, e.g., "the agencies are considering the advantages and disadvantages of requiring large banking organizations to maintain \*\*long-term debt capable of absorbing losses in resolution\*\*.") This proposal is a malicious self-serving attempt to shift predictable ("ex ante") costs to resolve the bankruptcy of a large banking organization from the FDIC's Depository Insurance Fund to unsuspecting investors. (See, e.g., "availability of this loss-absorbing resource at the insured depository institution &hellip; would be less costly to the DIF than a payout of insured deposits" and "[w\]here it is necessary to bail in the LTD, the value of the debtholder's note may be significantly or completely depleted.

Sent from my iPhone