Proposal: 1813 (AG64) Reg H, Q, LL & YY-Regulatory Capital Rule: Amendments to LBOs and

Banking Organizations

Description: The Office of the Comptroller of the Currency, the Board of Governors of the Federal

Reserve System, and the Federal Deposit Insurance Corporation are inviting public comment on a notice of proposed rulemaking (proposal) that would substantially revise the capital requirements applicable to large banking organizations and to banking organizations with significant trading activity. The revisions set forth in the proposal would improve the calculation of risk-based capital requirements to better r

Comment ID: 154747

From: Steve Veverka

Proposal:

Subject: R-1813 Regulatory Capital Rule: Amendments Applicable to Large Banking

Organizations and to Banking

Comments:

This current proposal to increase the capital requirements on banks as it stands would negatively impact families in Minnesota and across the country. We must take into consideration that this policy does not just affect banks, it will affect our economy as a whole, with the effects trickling down to consumers.

It is fundamental that our banks are prepared to handle any crisis and the annual stress tests that they undergo have repeatedly proven that they are. Our banks are well-equipped for any future crises with a capital ratio exceeding that of their European counterparts by more than two percentage points, so raising capital requirements now is unnecessary and would have unprecedented consequences.

If banks are required to maintain more capital, that means they will be faced with higher funding costs and less loans will be available for people who want to purchase homes or cars. But that's not all, small businesses won't be able to access the loans they need to buy equipment or hire more workers, further impeding the growth of their businesses.

I am especially concerned about the impact of this new rule on the whole economy. The Biden administration has worked to strengthen our economy post-pandemic and that progress could be put at risk if this proposal is passed. It is crucial that every aspect and impact of this policy is considered before making a decision that could worsen financial situations for families in Minnesota.

Steve Veverka