

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

Description:

Comment ID: 154740

From: Arizona State Representative, Consuelo Hernandez

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

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

Comments:

Dear Federal Reserve,

I write to you to express my strong opposition to the proposed rule changes that would increase banks' capital requirements and hurt low-income families. As a state representative for the people of Arizona, I am very concerned that this new proposal could have harmful effects on our communities and hurt both our local and national economies. An increase in capital requirements would likely make it more difficult for banks to lend to small businesses and individuals that need them in order to prosper.

According to the Urban Institute, the new rules would "disproportionately disadvantage low- and moderate-income (LMI) borrowers and communities, as well as Black and Hispanic borrowers." We must ensure that we protect our most marginalized community members and maintain their access to affordable loans and credit lines.

When considering this proposal, it is also important to acknowledge that our banks have more than enough capital already. In March of 2023, Treasury Secretary Janet Yellen stated that our "banking system is really safe and well-capitalized, it's resilient." Given that she and many other finance experts, as well as the stress tests that our banks undergo, have confirmed how solid our banks are, there is no need for this proposal.

I also must commend the Biden administration for their work ensuring our economy continues to grow in the aftermath of the COVID-19 pandemic and the Federal Reserve has been managing the rising inflation in the past year.

We must continue to build upon this progress and create an economy that works for all people, and in order to do so, we cannot implement this new rule. Taxpayers have already been hurt by rising inflation and housing costs-we cannot make it more difficult for them to secure loans for homes, cars, businesses, education, and other essential needs.

Thank you,

Consuelo Hernandez
Arizona State Representative, LD 21
SUSD School Board member