

**Commenter Name:** Scott Schanter

**Date:** November 29, 2023

**Submitted to:** OCC

**OCC Docket Number:** OCC-2023-0011

**Comment:** One concern with the proposed rule regarding long term debt requirements is that the proposed requirement may place pressure on institutions that undergo any type of financial stress, as any additional required debt may lead to an institution failing when it may have recovered or survived longer under different conditions.