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

Banking Organizations

Description:

Comment ID: 156796

From: West Michigan Plumbers Fitters and Service Trades U.A. Local #174, Ryan Bennett

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:

NONCONFIDENTIAL // EXTERNAL

To whom it may concern,

At U.A. Local 174 Union, we serve the interests of 850 active members, 240 retirees, and 160 apprentices in the West Michigan region and as such I am deeply concerned about the potential consequences the proposal to increase capital requirements on banks may have on our industry and, more importantly, our workforce.

Local 174 Union plays a crucial role in the construction sector within a 12-county region in West Michigan. We have long-standing contracts with over 40 construction companies across the country, with most of them based right here in West Michigan. These companies rely on our skilled trade workers on a daily basis to execute their projects efficiently and effectively.

The proposed increase in capital requirements would have a significant impact on the construction projects that our union members are involved in. This increase in capital requirements would result in higher costs for construction companies, making it more challenging for them to secure the necessary funds for their projects. Consequently, this could lead to delays, cancellations, or even a reduction in the number of construction projects undertaken.

Such a scenario would not only affect our local construction companies but also our union members. The construction industry has been a vital source of job availability and creation for our members, and any disruption in the sector would directly impact their livelihoods. Moreover, as you may know, the construction sector has a ripple effect on various other industries, including suppliers, transportation, and more, so any downturn in construction can have sweeping effects.

Our primary goal is to continue contributing to the growth of our community and the prosperity of our union members. I urge you to join us in our efforts to provide support for our union workers by opposing this proposal that would act as an impediment to future projects and job opportunities.

Thank you,
-Ryan
Ryan Bennett
Business Manager, Financial Secretary/Treasurer
West Michigan Plumbers Fitters and Service Trades U.A. Local #174
President/West Michigan Building Trades
O: 616-837-0222