

Proposal: 1814(AG65) Regulatory Capital Rule: Risk-Based Capital Surcharges GSIB BHCs; Systemic Risk (FR Y-15)

Description:

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From: David P. Dod

Proposal: 1814(AG65) Regulatory Capital Rule: Risk-Based Capital Surcharges GSIB BHCs; Systemic Risk (FR Y-15)

Subject: Risk-Based Capital Surcharges for Global Systemically Important BHCs; Systemic Risk Report (FR Y-15)

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Comments:

Date: Mar 18, 2024

Proposal: Regulatory Capital Rule: Risk-Based Capital Surcharges for Global Systemically Important Bank Holding Companies; Systemic Risk Report (FR Y-15) [R-1814]

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Your comment: As a financial/macro economist at the Federal Reserve Board (1971-87--LAC debt crisis and detail to the BIS) and for the US Agency for International Development (1987-2018--bank solvency crises in Jordan (Petra Bank), Russia in the mid-1990s, East Asia 1997, Ukraine circa 2000-02, Egypt) I am keenly aware of the need for the Federal Reserve and other regulators to remain a leader in Basel III commitments to raise capital requirements for all large banks to safe levels. I hope all agencies are paying attention to latest IMF blog post of March 2024:

[https://www.imf.org/en/Blogs/Articles/2024/03/18/more-work-is-needed-to-make-big-banks-resolvable?utm\\_medium=email;utm\\_source=govdelivery](https://www.imf.org/en/Blogs/Articles/2024/03/18/more-work-is-needed-to-make-big-banks-resolvable?utm_medium=email;utm_source=govdelivery)