CORPORATE AND SOCIETY INITIATIVE, STANFORD GRADUATE SCHOOL OF BUSINESS, LISA SANCHEZ-COREA SIMPSON

Proposal and Comment Information

Title: SLR-Enhanced Supplementary Leverage Ratio, R-1867

Comment ID: FR-2025-0038-01-C27

Subject

Comment on Regulatory Capital Rule R-1867 RIN 7100-AG96

Submitter Information

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Organization Type: Organization

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August 26, 2025

Via Electronic Mail

Chief Counsel's Office
Attention: Comment Processing
Office of the Comptroller of the Currency
400 7th Street, NW
Suite 3E-218
Washington, DC 20219
Docket ID OCC-2025-0006

Ms. Jennifer M. Jones
Deputy Executive Secretary
Attention: Comments/Legal OES
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
RIN 3064-AG11

Ms. Ann E. Misback
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
Docket No. R-1867, RIN 7100-AG96

Re: Regulatory Capital Rule: Modifications to the Enhanced Supplementary Leverage Ratio Standards for U.S. Global Systemically Important Bank Holding Companies and Their Subsidiary Depository Institutions; Total Loss-Absorbing Capacity and Long-Term Debt Requirements for U.S. Global Systemically Important Bank Holding Companies

To Whom It May Concern:

I am writing as a citizen who feels betrayed when financial rules are written to serve banks rather than the public. The current proposal to weaken leverage standards for the biggest banks is based on flawed, misleading claims made by those who profit from weak rules. Ordinary people bear the costs when those rules fail.

Big banks already fund themselves with dangerously high levels of debt and too little equity. The existing leverage requirements provide only meager protection, and cutting them back would erode even this thin shield, leaving these institutions more exposed to shocks and far more likely to fail.

When banks collapse, it is ordinary people who pay the price through bailouts and emergency government support. Meanwhile, executives and shareholders often walk away with their bonuses and dividends intact. Most importantly, it is ordinary people who suffer the most when the economy is badly damaged by bank failures as we saw quite clearly in the Great Recession less than two decades ago.

The proposal to exclude U.S. Treasuries from leverage calculations is based on wishful thinking that completely ignores interest-rate risk, the same mistake that triggered the collapse of Silicon Valley Bank and forced the government to yet again engage in extraordinary rescue measures. Ignoring this danger is reckless and invites more bank failures stemming from the very same hidden losses and false assurances that misled the public before.

Requiring banks to use more equity funding makes them sturdier and reduces the chance of another crisis, all at no cost to society. At last year's congressional hearing, bank CEOs falsely claimed that higher equity requirements would limit the public's access to loans. In reality, there is no guarantee that any "savings" from weaker rules would support lending or the broader economy—banks routinely choose to pay out dividends and buy back shares instead of strengthening their balance sheets. Weakening the rules offers no benefit to the public; it only protects banks' profits and executives' pay while increasing the risk taxpayers face in costly bailouts to banks and the risk that ordinary people face of a damaged economy.

We must not allow rules built on false claims to endanger the public again. Please protect citizens, not bankers, by strengthening, not weakening, capital standards.

Sincerely,

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