

ATRADIUS TRADE CREDIT INSURANCE, INC., JONATHAN HANDEN

Proposal and Comment Information

Title: Regulatory Capital Rule: Category I and II Banking Organizations, Banking Organizations with Significant Trading Activity, and Optional Adoption for Other Banking Organizations, R-1887

Comment ID: FR-2026-0007-01-C73

Submitter Information

Organization Name: Atradius Trade Credit Insurance, Inc.

Organization Type: Company

Name: Jonathan Handen

Submitted Date: 06/18/2026

Regulatory Capital Rules: Category I and II Banking Organizations, Banking Organizations with Significant Trading Activity, and Optional Adoption for Other Banking Organizations (the "ERBA Proposal"); Response to Question 51; and Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-weighted Assets (the "Standardized Proposal"); Response to Question 22.



June 18, 2026

Benjamin W. McDonough, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551
Email: publiccomments@frb.gov
Docket Nos. 1887, R-1888
RINs 7100-AH20, 7100-AH21

Jennifer M. Jones, Deputy Executive Secretary
Attention: Comments/Legal OES (RIN 3064-AF29)
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, D.C. 20429
Email: comments@FDIC.gov
RINs 3064-AF29, 3064-AG23

Chief Counsel's Office
Attention: Comment Processing
Office of the Comptroller of the Currency
400 7th Street, SW, Suite 3E-218
Washington, D.C. 20219
Docket IDs OCC-2026-0265, OCC-2026-0034
RINs 1557-AF52, 1557-AF49

Re: (i) Regulatory Capital Rules: Category I and II Banking Organizations, Banking Organizations with Significant Trading Activity, and Optional Adoption for Other Banking Organizations (the "ERBA Proposal"); Response to Question 51; and
(ii) Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-weighted Assets (the "Standardized Proposal"); Response to Question 22

Dear Ladies and Gentlemen:

Atradius Trade Credit Insurance, Inc. generally supports the positions set forth by the International Trade and Forfaiting Association and the International Association of Credit Portfolio Managers in their joint comments on Question 22 of the Standardized Proposal and Question 51 of the ERBA Proposal, with a slight deviation as referenced below.

Atradius Trade Credit Insurance, Inc. believes that the final rules should include adjustments that provide for broader recognition of providers of credit insurance and similar risk transfer arrangements for purposes of risk weight substitution, consistent with their risk profile and the prudential safeguards they are subject to. A clear and appropriately risk-aligned capital framework that recognizes the financial strength of insurance operating companies along with the market-validated strength of the consolidated group (as reflected by parent-issued debt) would facilitate the prudent use of these tools as part of sound credit risk management practices and support their broader application in enhancing

Atradius Trade Credit Insurance, Inc. Tel. +1 410-568-3800
211 Schilling Circle, Suite 200 Fax +1 410-568-3901
Hunt Valley, MD 21031

www.atradius.com



portfolio diversification and lending capacity. For purpose of clarity Atradius Trade Credit Insurance, Inc. believes the criteria under 2)(i) in the definition of Eligible Guarantor under 12 CFR 3.2 Definitions should be adjusted to:

- (i) *That at the time the guarantee is issued or anytime thereafter, has **(or, if the entity is investment grade, is part of a group of companies that has*)** issued and outstanding an unsecured debt security without credit enhancement that is investment grade;*

*Changes in bold italics

The current eligible guarantor requirements effectively preclude recognition of many well-established credit insurance arrangements. As a result, this constrains the use of tools that support sound lending, portfolio diversification, and prudent risk management. Highly rated and prudentially regulated insurance entities should therefore be eligible for recognition where they provide credit protection and demonstrate their financial capacity to perform on their obligations on a stand-alone basis as well as through debt securities issued by their parents or holding companies. Survey results indicate that more than 90% of participating large U.S. and U.S. Subsidiary banking institutions would have interest in executing transactions with insurance companies for credit risk mitigation if the eligible guarantor definition were clarified to recognize well-capitalized insurers as eligible guarantors.¹

Accordingly, we urge the Agencies to adopt the recommendations set forth herein to ensure a clear, workable, and appropriately risk-aligned framework for providers of credit insurance and similar products.

Sincerely,

Jonathan Handen
Vice President, Credit Specialties
Atradius Trade Credit Insurance, Inc.
211 Schilling Circle, Suite 200
Hunt Valley, MD 21031 USA
Tel: (443) 929-1239
Email: jonathan.handen@atradius.com

¹ [IACPM survey of US Banks and US Subsidiary Bank members conducted May 28, 2026; respondents were among the 30 largest U.S. banking institutions.]