WISCONSIN BANKERS ASSOCIATION, ROSE OSWALD POELS

Proposal and Comment Information

Title: Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-weighted Assets, R-1888

Comment ID: FR-2026-0008-01-C220

Submitter Information

Organization Name: Wisconsin Bankers Association

Organization Type: Organization

Name: Rose Oswald Poels

Submitted Date: 06/18/2026

Please find attached WBA's comments regarding RIN 7100–AH21.

June 18, 2026

Submitted Electronically

Chief Counsel's Office,
Attention: Comment Processing,
Office of the Comptroller of the Currency,
400 7th Street SW,
Suite 3E–218,
Washington, DC 20219.

Benjamin W. McDonough,
Secretary,
Board of Governors of the Federal Reserve System,
20th Street and Constitution Avenue NW,
Washington, DC 20551.

Jennifer M. Jones,
Deputy Executive Secretary,
Attention: Comments—RIN 3064–AG23,
Federal Deposit Insurance Corporation,
550 17th Street NW,
Washington, DC 20429.

RE: Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-Weighted Assets; OCC Docket ID OCC–2026–0034, RIN 1557–AF49; Federal Reserve Docket No. R–1888, RIN 7100–AH21; FDIC RIN 3064–AG23

Dear Ladies and Gentlemen,

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing nearly 180 state and nationally chartered banks, savings banks, and savings and loan associations of all sizes located in Wisconsin, their branches, and over 30,000 employees. WBA appreciates the opportunity to comment on the interagency proposal to revise the regulatory capital rule's standardized approach for risk-weighted assets (proposal).

WBA appreciates the agencies' work on the proposal. The approach taken reflects a deliberate, data-driven effort to calibrate risk weights to the actual risk characteristics of different exposure types and represents real progress toward the agencies' stated goals of improving risk sensitivity, enhancing transparency, and reducing unnecessary complexity. Wisconsin banks continue to operate from a position of strength, and WBA supports a capital framework appropriately calibrated to that strength.

At the same time, WBA encourages the agencies to ensure the benefits of this recalibration are shared evenly across the industry. As proposed, capital relief is concentrated in residential mortgage and retail exposures, while the commercial, agricultural, and commercial real estate lending equally important to Wisconsin banks sees comparatively little improvement. The agencies' own impact analysis estimates that smaller institutions will realize meaningfully less capital relief than larger ones. Left unaddressed, this dynamic risks widening the gap between community banks operating under the standardized approach and the largest institutions positioned to adopt the expanded risk-based approach.

WBA also supports several targeted refinements raised more specifically in other industry comment letters, including reconsideration of the risk weight applied to mortgage servicing assets, explicit recognition of private mortgage insurance as a credit risk mitigant, and a closer look at the operational risk add-on embedded within the standardized approach's mortgage and corporate risk weights. Adjustments along these lines, paired with greater risk sensitivity for commercial and agricultural lending, would better align the final rule with the agencies' own stated objectives.

WBA appreciates the agencies' consideration of these comments.

Respectfully,

Rose Oswald Poels

Rose Oswald Poels
President/CEO