DARREN AND ALISA PEDERSON

Proposal and Comment Information

Title: GSIB-Regulatory Capital Rule: Risk-Based Capital Surcharges for Global Systemically Important Bank Holding Companies; Systemic Risk Report (FR Y-15), R-1889

Comment ID: FR-2026-0009-01-C11

Subject

Docket No. R-1889; RIN 7100-AH22

Submitter Information

Name: Darren and Alisa Pederson

Submitted Date: 03/30/2026

Date: March 30th 2026
To:
Ann E. Misback, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
(Submitted via Federal Reserve Comment Portal)
Re: Opposing Proposed Reductions to Bank Capital Requirements
Docket No. R-1889; RIN 7100-AH22
To the Board of Governors of the Federal Reserve, the FDIC, and the OCC:
I am writing as an individual depositor and American homeowner to formally oppose the proposed rules that would reduce capital requirements for the nation's largest banking institutions.
While the agencies describe these changes as a "modernization" of the regulatory framework, the practical effect is a significant weakening of the safety cushions that protect the American financial system. I urge the agencies to reconsider this proposal based on the following concerns:

- **Unjustified Capital Relief**: The agencies' own estimates show these proposals would result in **$87.7 billion** in system-wide capital relief. For the largest Global Systemically Important Banks (G-SIBs), requirements would drop by approximately **4.8%**, while smaller regional banks would see a **5.2%**reduction.
- **Vulnerability of the Deposit Insurance Fund**: The FDIC's Deposit Insurance Fund (DIF) currently holds roughly $1.17 for every $100 in insured deposits—a ratio that remains well below the FDIC's own long-term target of **2.0%**. Following the $93 billion in obligations required to cover the 2023 bank failures, reducing bank-level capital now shifts the burden of risk further toward the DIF and, ultimately, the taxpayer.
- **Erosion of Public Trust**: As noted by Governor Michael Barr in his dissent, "Banking is built on trust." I agree with Governor Barr that reducing these core safety cushions, particularly while Federal Reserve supervisory staff has been cut by over 30%, is **"unnecessary and unwise."** It risks creating a "race to the bottom" regarding global financial standards.
- **Impact on Homeowners**: While the proposal claims to assist mortgage markets by eliminating deductions for **Mortgage Servicing Assets (MSAs)**, I believe that reducing the capital backing these volatile assets makes the institutions holding my home equity less resilient, not more.

The 2023 failures of Silicon Valley Bank and Signature Bank proved that "zero percent" reserve requirements and thin capital margins are insufficient during periods of high interest rates and economic stress.
As a depositor who was not consulted prior to this vote, I am using this comment period to urge the agencies to prioritize the stability of my savings and home equity over the short-term profitability of large financial institutions. Please maintain or strengthen the existing capital requirements.
Sincerely,
Darren and Alisa Pedersen

Sent from my iPhone