BANK POLICY INSTITUTE, ET. AL., GREGG ROZANSKY

Proposal and Comment Information

Title: Loans to Executive Officers, Directors, and Principal Shareholders of Member Banks; Bank Holding Companies (Reg O and Y), R-1896

Comment ID: FR-2026-0028-01-C17

Subject

Request for extension of the comment period - Docket No. R-1896 and RIN 3064-AG26

Submitter Information

Organization Name: Bank Policy Institute, et. al.

Organization Type: Organization

Name: Gregg Rozansky

Submitted Date: 09/08/2026

To whom it may concern -

Please see attached a request for an extension of the comment period for the Regulation O NPRs. This request is being filed on behalf of BPI, ABA and FSF.

Should you have any questions, please do not hesitate to let me know. Thank you for your consideration of this request.

Kind regards,
Gregg

September 8, 2026

Via Electronic Submission

Board of Governors of the Federal Reserve System
Attention: Benjamin W. McDonough, Secretary
20th Street and Constitution Avenue NW
Washington, DC 20551
Docket No. R-1896; RIN 1700-AH27

Federal Deposit Insurance Corporation
Attention: Jennifer M. Jones, Deputy Executive Secretary
550 17th Street NW
Washington, DC 20429
RIN 3064-AG26

RE: Request for Extension of Comment Period for Notices of Proposed Rulemaking on Extensions of Credit to Insiders

Ladies and Gentlemen:

The American Bankers Association, the Bank Policy Institute and the Financial Services Forum[1] request a 30- to 60-day extension of the comment period for the notices of proposed rulemaking issued by the Federal Reserve Board, to modernize Regulation O (the "Federal Reserve Proposal"),[2] and by the FDIC, to implement related adjustments to its regulations on extensions of credit to insiders (the "FDIC Proposal,"[3] and, together with the Federal Reserve Proposal, the "Proposals").

We appreciate the efforts of the Federal Reserve Board and the FDIC (together, the "Agencies") to modernize, clarify and streamline, on a comprehensive basis, the rules governing extensions of credit to insiders, which the Agencies have not significantly updated for decades. However, the 62-day comment period (in the case of the Federal Reserve Proposal) and the 60-day comment period (in the case of the FDIC Proposal) are not sufficient to analyze and comment thoroughly on the extensive Proposals.

The Federal Reserve Proposal poses 102 numbered questions, many of which contain multiple parts, and would restate Regulation O almost in its entirety. The FDIC Proposal is intended to align with the Federal Reserve Proposal, such that restrictions on extensions of credit to bank

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1 Please see the **Appendix** for a description of the undersigned associations.

2 Federal Reserve Board, Loans to Executive Officers, Directors, and Principal Shareholders of Member Banks; Bank Holding Companies, 91 Fed. Reg. 49526 (Aug. 4, 2026).

3 FDIC, Extensions of Credit to Insiders, 91 Fed. Reg. 50730 (Aug. 6, 2026).

insiders do not vary based on an institution's primary federal regulator.[4] Together, the Proposals could have significant legal, operational and compliance implications for banking organizations. In addition, the Proposals have ramifications for other key regulations, in particular, Regulation W. A meaningful response requires affected entities to assess how the proposed changes would affect the identification of insiders and related interests, the aggregation and valuation of extensions of credit, board-approval processes, lending and other transaction practices, recordkeeping and disclosure obligations and related compliance systems. We require additional time to analyze comprehensively the Proposals and gather relevant information in order to provide the most meaningful comment.

We support the Agencies' efforts to modernize the regulation of extensions of credit to insiders. However, an extension of the comment period is required to ensure that interested parties have the opportunity to study carefully the Proposals and consider all the issues raised by the Proposals, given their breadth, complexity, and significance. We believe an extension of at least 30 days from the current deadline would enable interested parties to consider the Proposals and provide meaningful input on rules that have not been significantly amended for decades. We also believe that a comment period of at least 90 days would be appropriate and consistent with previous comment periods for comparably complex and significant proposals.[5] Accordingly, we respectfully request that the Agencies extend the deadline for public comment from October 5, 2026 to no earlier than November 4, 2026.

We appreciate the opportunity to comment on the Proposals and your consideration of our request. If you have any questions, please contact Gregg Rozansky by email at Gregg.Rozansky@BPI.com.

Sincerely,

American Bankers Association
Bank Policy Institute
Financial Services Forum

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4 *Id.* at 50733.

5 *See, e.g.*, FDIC, Disclosure of Information; Extension of Comment Period, 91 Fed. Reg. 55501 (Aug. 28, 2026) (extending the original 62-day comment period by another 35 days); Federal Reserve Board, Debit Card Interchange Fees and Routing; Extension of Comment Period, 89 Fed. Reg. 5438 (Jan. 29, 2024) (extending the original 90-day comment period by another 90 days); Office of the Comptroller of the Currency, Federal Reserve Board and FDIC, Long-Term Debt Requirements for Large Bank Holding Companies, Certain Intermediate Holding Companies of Foreign Banking Organizations, and Large Insured Depository Institutions; Extension of Comment Period, 88 Fed. Reg. 83364 (Nov. 29, 2023) (extending the original 60-day comment period by another 47 days).

Appendix

American Bankers Association: The American Bankers Association is the voice of the nation's $26.5 trillion banking industry, which is composed of small, regional and large banks that together employ approximately 2 million people, safeguard $20.7 trillion in deposits and extend $13.9 trillion in loans.

The Bank Policy Institute: The Bank Policy Institute is a nonpartisan public policy, research and advocacy group that represents universal banks, regional banks, and the major foreign banks doing business in the United States. The Institute produces academic research and analysis on regulatory and monetary policy topics, analyzes and comments on proposed regulations, and represents the financial services industry with respect to cybersecurity, fraud, and other information security issues.

The Financial Services Forum: The Financial Services Forum is an economic policy and advocacy organization whose members are the eight largest and most diversified financial institutions headquartered in the United States. The Forum promotes policies that support savings and investment, financial inclusion, deep and liquid capital markets, a competitive global marketplace, and a sound financial system.