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May 8, 2018

Ann E. Misback, *Secretary*
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
Docket No. R-1604; RIN 7100 AF-03

Office of the Comptroller of the Currency
Legislative and Regulatory Activities Division
400 7th Street, SW, Suite 3E-218
Washington, DC 20219
Docket ID OCC-2018-0002

Re: Request for Extension of Public Comment Period on the Notice of Proposed Rulemaking Relating to the Recalibration of the Regulatory Capital, Enhanced Supplementary Leverage Ratio Standards for GSIBs and their Subsidiary IDIs.

Dear Sir or Madam:

The Independent Community Bankers of America (ICBA)¹ requests that the Federal Reserve Board and the Office of Comptroller of the Currency (collectively, the “Banking Agencies”) extend by at least 30 days the deadline for the comment period on the Notice of Proposed Rulemaking titled “Regulatory Capital Rules: Regulatory Capital, Enhanced Supplementary Leverage Ratio Standards for U.S. Global Systemically Important Bank Holding Companies and their Subsidiary Insured Depository Institutions” (the “Proposed Rule”).²

ICBA believes that a 30-day comment period which ends on May 21, 2018 is far too short for such a complex and important proposal. The Banking Agencies acknowledge that if the Proposed Rule were to be adopted, minimum tier 1 capital requirements would drop by \$9 billion

¹ The Independent Community Bankers of America®, the nation’s voice for nearly 5,700 community banks of all sizes and charter types, is dedicated exclusively to representing the interests of the community banking industry and its membership through effective advocacy, best-in-class education and high-quality products and services. With nearly 52,000 locations nationwide, community banks employ 760,000 Americans, hold \$4.9 trillion in assets, \$3.9 trillion in deposits, and \$3.3 trillion in loans to consumers, small businesses, and the agricultural community. For more information, visit ICBA’s website at www.icba.org.

² See 83 Fed. Reg. 17317 (Apr. 19, 2018)

for global systemically important bank holding companies or GSIBs and by \$121 billion for those insured depository institutions (IDIs) of GSIBs. This would be significant drop in tier 1 capital requirements for the IDIs of the eight U.S. GSIBs and therefore requires more time for careful analysis and review as to its impact on the industry and the financial system. Furthermore, the industry needs more time to evaluate whether these changes to the supplemental leverage ratio for GSIBs would provide an adequate backstop to risk based capital requirements and whether these changes would enhance systemic stability with the long-term goal of credit availability, efficiency and business growth.

In conclusion, ICBA requests that the Banking Agencies extend the May 21st comment period deadline for at least 30 days to allow the industry more time to evaluate the overall impact to the financial system from such a proposed significant reduction in tier 1 capital for the GSIBs.

Sincerely,
/s/ Christopher Cole

Christopher Cole
Executive Vice President and Senior Regulatory Counsel
ICBA