

January 30, 2026

Federal Deposit Insurance Corporation
Jennifer M. Jones, Deputy Executive Secretary
550 17th Street NW
Washington, DC 20429.

Office of the Comptroller of the Currency
Chief Counsel's Office
400 7th Street SW, Suite 3E-218
Washington, DC 20219

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

**RE: Regulatory Capital Rule: Revisions to the Community Bank Leverage Ratio
Framework (OCC Docket No. OCC-2025-0141; FRB Docket No. R-1876 & RIN 7100-AH08;
FDIC RIN 3064-AG17)**

To whom it may concern:

On behalf of thousands of community banks across the country, the Independent Community Bankers of America (“ICBA”) and the undersigned 45 state associations applaud the Federal Deposit Insurance Corporation (FDIC), the Office of the Comptroller of the Currency (OCC), and the Board of Governors of the Federal Reserve System (Board) for the proposal to recalibrate the Community Bank Leverage Ratio (CBLR). We support this proposal and encourage the agencies to promptly issue a final rule so that additional community banks have the opportunity to opt into the CBLR framework, and those that opt in can better meet the credit needs in their local communities.

The CBLR framework is an important tool for those community banks that opt in, appropriately streamlining reporting burdens while maintaining robust capital requirements that ensure the safety and soundness of the banking system. The proposed rule would recalibrate the CBLR to 8 percent, making it a more practical alternative for community banks that operate with a straightforward business model and enabling additional community banks to opt in to the framework. The proposed revisions would also provide community banks that opt in with additional room on their balance sheets, which will expand their capacity for prudent lending that meets credit needs in local communities. This will have significant economic benefits. Community banks have a low risk profile and a major impact on the economy, powering Main Street economies by providing access to credit and banking services to America’s small businesses, agricultural sector, and rural communities.

The proposed extension of the grace period is another welcome revision. The proposal will give community banks that opt in to the CBLR the flexibility to remain in the framework, avoiding the costs and other burdens they would otherwise incur by being forced to comply with more complex risk-based capital reporting requirements due to short term fluctuations.

We commend the FDIC, OCC, and the Board for this proposal to recalibrate the CBLR and for their commitment to rightsizing burdens on community banks. We encourage the agencies to further tailor community bank regulatory requirements and provide additional relief that will allow community banks to operate more efficiently and fuel economic growth and prosperity for all Americans.

Sincerely,

Alabama Bankers Association
Arkansas Community Bankers
Arizona Bankers Association
California Community Banking Network
Independent Community Bankers of Colorado
Connecticut Bankers Association
Florida Bankers Association
Community Bankers Association of Georgia
Idaho Bankers Association
Community Bankers Association of Illinois
Indiana Bankers Association
Community Bankers of Iowa
Community Bankers Association of Kansas
Bluegrass Community Bankers Association
Louisiana Bankers Association
Maine Bankers Association
Maryland Bankers Association
Massachusetts Bankers Association
Community Bankers of Michigan
BankIn Minnesota
Mississippi Bankers Association
Missouri Independent Bankers Association
Montana Independent Bankers
Nebraska Independent Community Bankers

New Hampshire Bankers Association
New Jersey Bankers Association
Independent Community Bankers Association of New Mexico
Independent Bankers Association of New York State
North Carolina Bankers Association
Independent Community Banks of North Dakota
Tennessee Bankers Association
Community Bankers Association of Ohio
Community Bankers Association of Oklahoma
Oregon Bankers Association
Pennsylvania Association of Community Bankers
Independent Banks of South Carolina
Independent Community Bankers of South Dakota
Tennessee Bankers Association
Independent Bankers Association of Texas
Vermont Bankers Association
Virginia Association of Community Banks
Community Bankers of Washington
Community Bankers of West Virginia
Wisconsin Bankers Association
Wyoming Bankers Association