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*President and CEO*

May 20, 2015

The Honorable David Vitter  
United States Senate  
Washington, D.C. 20510

Dear Senator Vitter:

On behalf of the more than 6,000 community banks represented by the Independent Community Bankers of America, I write to express our support for your “too-big-to-fail” amendment to the Financial Regulatory Improvement Act of 2015.

Your amendment would require that all bank holding companies automatically designated as systemically important financial institutions (SIFIs) under the Act (i.e., all bank holding companies with assets in excess of \$500 billion) have equity capital of at least 10 percent of assets, under an asset definition that includes the fair value of off-balance sheet derivatives.

Your amendment provides a clear, easy-to-implement solution to the persistent threat posed by too-big-to-fail institutions that remain so big and interconnected that the government would not allow them to fail. Too-big-to-fail distorts free markets and capital flows, incentivizes risky behavior, leaves taxpayers on the hook for bailouts, and creates an unfair competitive advantage for the largest megabanks.

ICBA looks forward to working with you on this proposal and other solutions to the critical problem of too-big-to-fail.

Sincerely,

/s/

Camden R. Fine  
President & CEO

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