

Title: Proposed Guidance on Leveraged Lending

FR Document Number: 2012-07620

Publish Date: 3/30/2012 12:00:00 AM

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Comment: Your definition of Leveraged Lending is focused on Use of Proceeds, which makes the definition worthless. The proposed Guidance is detailed and comprehensive but if you simply read the Guidance it could apply to any loan product. The Guidance is a waste of time because all it really says is make prudent loans with proper internal controls for evaluating and recording loans in process against written underwriting standards. What loan is not supposed to be managed that way?

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