



My name is Daylon A. Davis, and I recently assumed the role of President at the Pittsburgh NAACP earlier this year. I am writing to express my sincere apprehensions about the potential ramifications of the proposed rule to raise bank capital requirements.

Throughout my tenure as an advocate for social justice, I have consistently emphasized the importance of combating policies that unfairly impact communities of color. Today, I would like to underscore my concerns regarding how the proposed increase in bank capital requirements could place undue financial constraints on these communities.

Raising the reserves that banks are mandated to hold poses significant economic challenges for families of color, who heavily depend on banking institutions for the capital necessary to facilitate essential endeavors. Whether it be securing a mortgage for homeownership or obtaining a loan to establish a business, communities of color rely on these financial avenues to build intergenerational wealth. Unfortunately, the proposed regulation threatens to exacerbate the difficulties associated with these pursuits, as banks may curtail their funding initiatives, thereby impeding the ability to purchase homes, initiate entrepreneurial ventures, and more.

It is worth noting that our national leaders, including members of President Biden's cabinet such as Treasury Secretary Janet Yellen, have affirmed the robustness of the banking industry. Stress tests and other safeguards currently in place attest to the readiness of banks to weather potential financial challenges. Secretary Yellen herself has asserted that "there is adequate capital and liquidity in America's banking system." Given the existing measures that uphold our banking institutions to the highest global standards, it is imperative that we exercise caution in altering a system that has proven effective.

The Biden-Harris administration has championed initiatives to foster equal opportunities for communities of color, enabling them to thrive and grow. In light of this progress, I respectfully urge your reconsideration of the proposal to increase capital requirements. Rejecting this measure will contribute to the ongoing economic advancement that these communities deserve.

Sincerely,

Daylon A. Davis
President, NAACP Pittsburgh Branch