From:
Sent: Tuesday, September 24, 2013 10:09 AM
To: regs.comments@occ.treas.gov; regs.comments@federalreserve.gov; Comments; rule-comments@sec.gov
Subject: Credit Risk Retention - Comment - U.S. Treasury “Docket ID OCC-2013-0010", also Federal Reserve "Docket No. R - 1411" , also for FDIC "RIN 3064 - AD74", also for SEC "File Number S7-14-11"

Required Information provided in **RED** below for this Comment on "Credit Risk Retention" solicited from the General Public by the combined:
U.S. Treasury,
Federal Reserve,
SEC,
FHA,
FDIC, and
HUD

1. **“OCC” is the agency name**

2. **“Docket Number OCC-2013-0010**

In this U.S. Treasury web site:
http://www.sec.gov/rules/proposed/2013/34-70277.pdf

My Comments below:
The proposal indicates a minimum of 5% Credit Risk Retention for "Assets Collateralized by Asset Backed Securities"
and exempts certain residential mortgages classified as “qualified residential mortgages” backed securities:

A. I would strongly recommend the minimum 5% Credit Risk Retention be **higher as 20%** despite some of the known liquidity disadvantages to this higher value.

B. I would strongly recommend the proposed NO EXEMPTION for “qualified residential mortgages” be removed as an exemption so those securities also be included similar to other ABSs, again despite known disadvantages to this exclusion omission.

The rationale for both these comments and recommendations are rooted in the recent past financial problems and that a "mere" 5% will hardly alter behavior and thereby **NOT** cause any significant change in behavior which is supposedly the intent of this Proposed Rule. Simply stated, 5% will **NOT** accomplish the intended purpose.

I may be reached at this e-mail address if desired or necessary, but my e-mail address is not noted here so it will not be disclosed with my comments.

Robert G.
Woodbridge VA