



INSTITUTE OF INTERNATIONAL BANKERS

299 Park Avenue, 17th Floor
New York, N.Y. 10171
Direct: (646) 213-1149
Facsimile: (212) 421-1119
Main: (212) 421-1611
www.iib.org

RICHARD W. COFFMAN
General Counsel
E-mail: rcoffman@iib.org

September 25, 2017

Ann E. Misback
Secretary
Board of Governors of the
Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
regs.comments@federalreserve.gov
(Docket No. R-1571, RIN 7100 AE 83)

Legislative and Regulatory Activities
Division
Office of the Comptroller of the Currency
400 7th Street, SW
Suite 3E-218, mail stop 9W-11
Washington, DC 20219
regs.comments@occ.treas.gov
(Docket ID OCC-2017-0012)

Robert E. Feldman
Executive Secretary
Attn: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
comments@fdic.gov
(RIN 3064-AE 63)

Re: Regulatory Capital Rules: Retention of Certain Existing Transition Provisions for Banking Organizations That Are Not Subject to the Advanced Approaches Capital Rules

Ladies and Gentlemen:

The Institute of International Bankers (“IIB”) appreciates the opportunity to comment on the notice of proposed rulemaking referenced above.¹ The IIB’s members are banking organizations headquartered outside the United States which engage in a variety of banking and other financial activities in the United States. Their U.S. bank holding company, intermediate holding company and insured depository institution subsidiaries are subject to the Agencies’ regulatory capital rules and therefore would be directly affected by the Proposal.

¹ 82 Fed. Reg. 40495 (August 25, 2017) (the “Proposal”). Capitalized terms used in this letter have the meanings ascribed in the Proposal, except as otherwise indicated or required by the context.



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The Proposal would extend for Non-Advanced Approaches Banking Organizations certain transition provisions currently in the Capital Rules while the Simplification NPR is pending. We strongly agree that any review of the Capital Rules to tailor their requirements and reduce regulatory burden must be guided by the need to maintain safety and soundness and the quality and quantity of regulatory capital in the banking system. Consistent with this balanced approach, we believe it would be appropriate to include in this process review of certain aspects of the Advanced Approaches, including their application to banking organizations with total consolidated assets of less than \$250 billion, and to extend the transition provisions covered by the Proposal accordingly.

We appreciate your consideration of our comments. Please contact the undersigned if we can be of further assistance.

Sincerely,



Richard Coffman
General Counsel