CALIFORNIA
BANKERS
ASSOCIATION

June 21, 2019

Via electronic mail to Comments@FDIC.gov

Federal Deposit Insurance Corporation
550 17th Street NW
Washington, D.C. 20429
Attn: Robert E. Feldman, Executive Secretary

Re: Advance Notice of Proposed Rulemaking for IDI Rule on Resolution Plans
RIN 3064-AF05

Dear Mr. Feldman:

The California Bankers Association ("CBA") welcomes the opportunity to comment on the Advance Notice of Proposed Rulemaking ("ANPR") on the subject of tailoring and streamlining the rules requiring certain insured depository institutions to submit resolution plans.

In addition to reviewing the ANPR itself, CBA had the opportunity to review a recent draft of a comment letter (the "ABA Letter") prepared on behalf of the Bank Policy Institute, the Securities Industry and Financial Markets Association and the American Bankers Association (of which CBA is a member).

CBA concurs with the suggestions and recommendations contained in the ABA Letter. In addition, CBA wishes to draw the FDIC's attention to two issues of particular concern to a CBA member, both of which are addressed more fully in the ABA letter.

First, the ANPR proposes two alternative tiered requirements to determine the content of the resolution plans IDIs are required to provide. CBA supports the use of "Alternative One," which would categorize institutions based on their size and complexity and apply set content requirements to each category. CBA believes that this approach, with appropriately indexed asset thresholds, lends desired predictability to the resolution planning process. In contrast, "Alternative Two," which the ANPR describes as a process by which size, complexity and other factors would be evaluated in the context of various elements of a resolution plan, such than an element of the plan would not be required unless a corresponding metric crosses a certain threshold, is unduly complex. That approach would involve consideration of an undetermined number of variables in order to arrive at a plan's required content, which CBA believes to be unduly burdensome and uncertain.

Second, CBA supports the ABA Letter's response to Question 29 of the ANPR, which asks whether the FDIC should consider a schedule of alternating between full resolution plan submissions and submissions with streamlined content. CBA's sense is that reporting institutions find the requirement of frequent full submissions, which may largely involve mere reiteration of material previously disclosed, are burdensome to the institution and provide little value to the FDIC. If the submission cycle were extended, and alternating submissions were streamlined to require, for example, disclosure of any material changes or confirmation of particularly crucial information, the FDIC's needs could be met while reducing the regulatory burden on the reporting institutions.

Thank you very much for the opportunity to comment on this ANPR. If you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

CALIFORNIA BANKERS ASSOCIATION

[redacted]

Martha Evensen Opich
Vice President and Association Counsel