

From: alan keeler
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Concerning the Proposed Statement of Policy on Qualification for Failed Bank Acquisitions Section II Question #3. As noted by recent economic opinions, the 15% leverage ratio proposed is three times that of the regulatory standard applied to the highest capitalized banks. The FDIC is right to seek the safety and soundness of these new acquisitions but as performance is typically weak in the early years it seems that encouraging new investment would be of equal, not secondary, consideration. As such, even double (10%) the leverage ratio appears to satisfy both concerns. Another risk adverse alternative would be to scale the ratio down across the three year holding period, ending at a modest 7-8%. This would have the benefit of ramping up private equity investment while stability increased and covering the most unstable period i.e. the first year.

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