

**To:** [Comments](#)  
**Subject:** Single Point of Entry Strategy - public comment  
**Date:** Wednesday, February 05, 2014 10:12:30 AM

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Valuation of financial assets & liabilities is inherently challenging given the breadth of structured products which exist today. During periods of liquidity stress and contagion, valuation becomes daunting.

Comments: The **process and team** assigning failed SIFI asset & liability valuation must be identified prior to a SIFI's default. First, the valuation team must include a cross-section of private sector capital market experts not affiliated with the SIFI, as well as agency capital market experts. Second, these experts **must** be compensated close to private sector market peers. This was not the case before or during the 2008 crisis.

Third, these experts should only be called upon during times of stress as determined by the FDIC Chair.

The amount of equity and unsecured debt that would be needed to establish a new bridge financial company will be determined by the market confidence of the **deal valuation** & deal structure. To opine on specific equity & debt terms is premature and ignores the uncertain reality during a liquidity crisis. What is most important is the FDIC establish a credible process and a team which can be called upon.

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