



December 15, 2017

VIA ELECTRONIC SUBMISSION

The Honorable Ann E. Misback  
Secretary  
Board of Governors of the Federal Reserve  
System  
20th Street and Constitution Avenue, N.W.  
Washington, D.C. 20551

The Honorable Martin J. Gruenberg  
Chairman  
Federal Deposit Insurance Corporation  
550 17th Street, N.W.  
Washington, D.C. 20429

The Honorable Joseph M. Otting  
Comptroller  
Office of the Comptroller of the Currency  
400 7<sup>th</sup> Street, SW  
Washington, DC 20219

Re: Simplifications to the Capital Rule Pursuant to the Economic Growth and Regulatory  
Paperwork Reduction Act of 1996 Docket ID OCC-2017-0018

Simplifications to the Capital Rule Pursuant to the Economic Growth and Regulatory Paperwork  
Reduction Act of 1996 Docket No. R-1576; RIN 7100 AE-74

Simplifications to the Capital Rule Pursuant to the Economic Growth and Regulatory Paperwork  
Reduction Act of 1996 RIN 3064-AE 59

Dear Secretary Misback, Chairman Gruenberg, and Comptroller Otting:

The Office of Advocacy of the U.S. Small Business Administration (Advocacy) submits this request for an extension to file comments for the above referenced notice of proposed rulemaking (NPRM).

The agencies published the NPRM on October 27, 2017. The purpose of the NPRM is to reduce the burden on financial institutions. Initially, the NPRM did not raise any concerns for Advocacy. However, recently, some issues have come to our attention. Advocacy respectfully requests an extension of twelve business days<sup>1</sup> from the December 26, 2017 deadline in order to give full consideration to the issues that have been raised prior to submitting comments.

If you have any questions, please contact me at 202-205-6533 or Major.Clark@sba.gov. Thank you for your consideration.

Sincerely,



Major I. Clark, III  
Acting Chief Counsel for Advocacy

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<sup>1</sup> By Advocacy's calculation, the new due date would be January 12, 2018 at the earliest.