

From: Tyler Stutz

Sent: Friday, February 08, 2019 11:36 AM

To: Comments

Subject: December 28, 2018 - Company-Run Stress Testing Requirements; Comment Request (RIN 3064-AE84)

To: FDIC

From: Tyler Stutz

Re: Company-Run Stress Testing Requirements

Date: 2/8/19

Thank you for the opportunity to comment. While the proposed rule is offered under the guise of “efficiency” and “allowing for a better allocation of resources,” the truth of the matter is that this is an attempt by a harshly pro-business administration to roll back regulations it sees unnecessary. However, ensuring that financial institutions are properly analyzing and preparing for the future is nothing short of necessary. How can we be certain that only 10 short years after the financial crisis we are in a position that does not warrant as many tests? These tests provide a wealth of information that serves to ultimately improve the health of the institution, the market, and to avoid catastrophic consequences. By raising the threshold of total assets for covered institutions, fewer tests will be conducted market-wide, and more uncertainty will exist. While banking insiders see the requirement of stress testing as wasted capital, consumers and everyday shareholders depend on the tests to help protect their assets.