



November 26, 2018

*Via email*

Robert E. Feldman, Executive Secretary  
Attention: Comments/Legal E55  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, D.C. 20429

RE: **Regulatory Capital Treatment for High Volatility Commercial (HVCRE) Exposures  
RIN 3064-AE90**

Dear Sir:

Western Bankers Association (WBA) supports the FDIC's proposed amendment to the regulatory capital rule to conform the definition of "high volatility commercial real estate (HVCRE) exposure" to the definition enacted as Section 214 of the Economic Growth, Regulatory Relief and Consumer Protection Act (EGRRCPA) (amending the Federal Deposit Insurance Act (12 U.S.C. §1811)).

WBA supported enactment of EGRRCPA, and believes that the FDIC's proposed amendment to the regulatory capital rule captures the intent of Section 214 OF EGRRCPA with respect to the treatment of HVCRE.

WBA recommends that the amendment to the regulatory capital rule be adopted as proposed.

Very truly yours,

WESTERN BANKERS ASSOCIATION

By:



Martha Evensen Opich  
Vice President  
Association Counsel