

January 31, 2014

Office of the Comptroller of the Currency  
Legislative and Regulatory Activities Division  
400 7th Street SW  
Suite 3E-218, Mail Stop 9A-11  
Washington, DC 20219  
Docket Number OCC-2013-0016

Federal Deposit Insurance Corporation  
550 17th Street NW  
Washington, DC 20429  
Attn.: Comments, Robert E. Feldman,  
Executive Secretary  
RIN 3064-AE04

Board of Governors of the Federal Reserve System  
20th Street and Constitution Avenue NW  
Washington, DC 20551  
Attn.: Robert de V. Frierson  
Docket No. R-1466

Re: Proposed Liquidity Coverage Ratio Requirement

Dear Sir or Madam:

The undersigned appreciate the opportunity to comment on the proposed liquidity coverage ratio (“LCR”) regulations issued by the Office of the Comptroller of the Currency (the “OCC”), the Board of Governors of the Federal Reserve System (the “Board”) and the Federal Deposit Insurance Corporation (the “FDIC” and, together with the OCC and the Board, collectively, the “Agencies”) entitled “*Liquidity Coverage Ratio: Liquidity Risk Measurement, Standards and Monitoring*” (the “Proposed Rule”).<sup>1</sup>

We refer you to the comment letter on the Proposed Rule dated today’s date (the “SFIG/SIFMA Comment Letter”) from The Structured Finance Industry Group and the Securities Industry and Financial Markets Association. More specifically, we refer you to Part IA of the SFIG/SIFMA Comment Letter that requests “look through” treatment for a subset of securitization facilities (defined in the SFIG/SIFMA Comment Letter as “bank customer securitization credit facilities”) that provide a necessary and efficient funding source for the real economy.

Each of the undersigned is a user of a bank customer securitization credit facility. As described in the SFIG/SIFMA comment letter, these facilities are an important part of our financing of extensions of credit to our customers that we make as a core part of our businesses. We value these facilities because (i) they are among our least expensive sources of funding, (ii) allow us to secure funding based upon the credit quality of the assets that we originate, thereby further

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<sup>1</sup> See <http://www.gpo.gov/fdsys/pkg/FR-2013-11-29/pdf/2013-27082.pdf>.

diversifying our funding sources, and (iii) allow banks to diversify what would otherwise be their credit exposure to us through funding obtained based upon asset credit quality.

A 100% outflow amount is applied to bank customer securitization credit facilities under the Proposed Rule notwithstanding that these facilities are established as substitutes for, or complements to, traditional secured and unsecured revolving credit facilities and are often drawn on in much the same manner and in the same amounts as the facilities for which they act as substitutes. Bank customer securitization credit facilities should therefore be assigned the same outflow amounts under the LCR regulations as undrawn credit commitments extended directly to us. Incremental funding requests under these facilities are driven by our borrowing needs in much the same manner as incremental funding requests under traditional revolving credit facilities. For both traditional revolving credit facilities and bank customer securitization credit facilities, the decision to borrow is initiated by us.

We are concerned that applying a 100% outflow amount to undrawn credit commitments under bank customer securitization credit facilities could impact the availability or pricing of these facilities, thus curtailing our ability to provide cost effective financing to our customers and negatively impacting our ability to diversify the funding of our daily business, invest in new growth initiatives and create jobs.

We therefore respectfully ask that the Agencies provide “look through” treatment for bank customer securitization credit facilities as requested in the SFIG/SIFMA Comment Letter.

Respectfully Submitted,

Arch Chemicals, Inc.  
Arch Coal, Inc.  
Arkansas Best Corporation  
Ascentium Capital LLC  
BBL Fleet Co.  
Blyth, Inc.  
Carmax, Inc.  
Cincinnati Bell Inc.  
Commercial Credit Group Inc.  
CONSOL Energy Inc.  
Direct Capital Corporation  
Duke Energy Corporation  
Emkay, Inc.  
Enterprise Fleet Management, Inc.  
Fleetcor Technologies, Inc.  
FMC Corporation  
Ford Motor Company  
Foursight Capital LLC  
General Electric Capital Corporation

General Motors Financial Company, Inc.  
GreatAmerica Financial Services Corporation  
Harley-Davidson Financial Services, Inc.  
Hyundai Capital America  
Insight Enterprises, Inc.  
Kelly Services, Inc.  
Lennox International Inc.  
Marathon Petroleum Corporation  
McKesson Corporation  
Meritor, Inc.  
Newell Rubbermaid Inc.  
PHH Corporation  
Rock-Tenn Company  
Ruan, Incorporated  
Services Group Of America  
Swift Transportation Company  
Targa Resources Partners LP  
Tenneco Inc.  
TransDigm Group Inc.  
Triumph Group, Inc.  
UGI Energy Services, LLC  
Union Leasing  
Universal Health Services, Inc.  
Volvo Financial Services Region the Americas  
VW Credit, Inc.  
World Omni Financial Corp.  
Worthington Industries, Inc.