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To: Comments <Comments@FDIC.gov>

Subject: October 17, 2019 - Interagency Guidance on Credit Risk Review Systems; Proposed guidance; Comment Request (RIN 3064-ZA09)

I skimmed the proposal, and I may have missed it. The document mentions the need to convert from ALLL to ACL, but does not mention assets other than loans. The document would be improved if it mentioned that ACL covers loans as well as securities. Securities can possess credit risk and have precipitated bank failures.

Thank You