

From: [Midwestern Banker]
Sent: Tuesday, March 12, 2019 10:11 AM
To: Comments
Subject: RIN 3064-AE91

While we applaud the proposed changes for simpler measure of capital adequacy, we believe the 9% leverage ratio is too high.

Our bank has always been considered “Well Capitalized” based on current definition. However, going to a 9% leverage ratio will put us right on the cut-off.

Since current leverage ratio to be “Well Capitalized” is 5%, going to 9% is too high .

[Midwestern Banker]