



November 21, 2022

*Via Electronic Mail*

Ann E. Misback, Secretary  
Board of Governors of the Federal Reserve System  
20th Street and Constitution Ave., NW  
Washington, DC 20551

James P. Sheesley, Assistant Executive Secretary  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429

Re: Request for Extension of Comment Period Deadline with Respect to Advanced Notice of Proposed Rulemaking on Resolution-Related Resource Requirements for Large Banking Organizations. RIN 7100-AG44; RIN 3064-AF86.

Dear Ms. Misback, Mr. Sheesley:

The Bank Policy Institute and the American Bankers Association (the "Associations") respectfully requests that the Federal Reserve Board and Federal Deposit Insurance Corporation (the "Agencies") extend by 60 days the deadline for public comments on their Advanced Notice of Proposed Rulemaking on Resolution-Related Resource Requirements for Large Banking Organizations ("Large Bank Resolvability ANPR"). The Agencies' stated goal of the ANPR is to solicit public input regarding whether an extra layer of loss-absorbing capacity could improve optionality in resolving a large banking organization or its insured depository institution subsidiary, as well as the costs and benefits of such a requirement. The Associations are engaged in a careful review and analysis of the many sub-questions posed in the ANPR and will prepare a comment letter that we hope will provide the Agencies with the requisite information and analysis to help guide further consideration of this issue.

The Associations are concerned that the existing comment deadline will not provide sufficient time to perform the level of analysis that the numerous and wide-ranging questions in the ANPR warrant, particularly given the potential consequences across a wide variety of banking organizations. A complete analysis will require the Associations' member institutions to solicit input from subject matter experts in various divisions across their organizations, which will be impeded by the Thanksgiving holiday when the availability of personnel will be limited.

For these reasons, the Associations respectfully request that the Agencies extend the deadline for comments on the ANPR for at least an additional 60 days, with a new deadline for public comments of February 21, 2023. Our goal is to develop a carefully considered and well-informed comment letter that

will be constructive for the Agencies in considering these important issues further, and we believe this additional time will be valuable in achieving that goal.

Thank you for your consideration of this request.

Sincerely,



Lauren A. Anderson  
Senior Vice President & Senior Associate  
General Counsel  
Bank Policy Institute



Hu A. Benton  
Senior Vice President and Policy Counsel  
Prudential Regulation and Asset Management  
American Bankers Association