

Proposal: 1509 (AE30) Reg Q,Y&LL; Small BHC Policy Statement; Capital Adequacy Board-Regulated Institutions;

Description: The Board is proposing to raise the asset size threshold for determining applicability of the Board's Small Bank Holding Company Policy Statement (Regulation Y, Appendix C)(Policy Statemnt) to \$1 billion from \$500 million and to expand the scope of the Policy Statement to include savings and loan holding companies that also met the Policy Statement's requirements. The Board is also proposing to make related and conforming revisions to Regulation Y and Regulation LL.(Final Rule, 4/15/2015)

Comment ID: 129883

From: Christian Mueller

Proposal:

Subject: Small BHC Policy Statement; Capital Adequacy Board-Regulated Institutions; Bank Holding Companies; S

Comments:

Date:Feb 03, 2015

Proposal:Small Bank Holding Company Policy Statement; Capital Adequacy of Board-Regulated Institutions; Bank Holding Companies; Savings and Loan Holding Companies; Changes to Reporting Requirements. [R-1509]

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First name:Christian

Middle initial:A

Last name:Mueller

Affiliation (if any):

Affiliation Type: ()

Address line 1:364 Forest Dr SE

Address line 2:

City:Cedar Rapids

State:Iowa

Zip:52403

Country:UNITED STATES

Postal (if outside the U.S.):

Your comment:I work for a community bank that just hit the \$500 million mark and there are significant impacts as a result. The Fed is proposing rules for raising the asset size threshold from \$500 mil to \$1bil for determining applicability of the Board's Small Bank Holding rules. What this means to bank holding companies of our size is that 1)F&M would have the ability to borrow (if need be) for any additional mergers or acquisitions 2)A potential cost savings relating to the audit requirement 3) continuation of a "normal" examination cycle of 18 months (this would be expedited to a 12 month rotation for F&M if the asset size threshold for Small Bank Holding Companies remain at less than \$500 mil) 4)Avoidance of additional internal reporting to the Fed at the holding company level. Any relief for banks like ours that are still relatively small banks would be great. Thank you for your consideration.