

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)

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Comment ID: 129886

From: Farmers and Merchants Bank, Daniel Lynch

Proposal:

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

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Comments:

Date:Feb 05, 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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Revision:1

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Your comment:I am supportive of the Federal Reserve Docket No. R-1509 for raising the asset size threshold for Small Bank Holding Companies from \$500 Million to \$1 Billion.This limit was last raised in 2006 and merits this action by the Board. This permanent change to the currently effective 6 month action taken on December 18, 2014, would benefit small to medium sized Banks and the customers and communities in which they serve. In addition, this proposed permanent change would allow small Bank Holding Companies to be more operationally efficient thereby being of better service to their customers. I foresee no unintended consequences for small banking organizations and support the Board in passing a permanent change to Docket No. R-1509 in the current form that it is written.