



American  
Bankers  
Association



THE FINANCIAL  
SERVICES  
ROUNDTABLE

March 19, 2012

Mr. Robert E. Feldman  
Executive Secretary  
Attention: Comment/Legal ESS  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429  
**RIN 3064-AD91**

Office of the Comptroller of the Currency  
250 E Street, SW  
Mail Stop 2-3  
Washington, DC 20219  
**Docket Number OCC-2011-0029**  
**RIN 1557-AD58**

Re: Request for Extension of Comment Deadlines with respect to Proposed Rules  
Implementing Section 165(i)(2) of Dodd-Frank

Ladies and Gentlemen:

The Clearing House Association L.L.C., American Bankers Association, and The Financial Services Roundtable (“**The Associations**”) are writing to request that the Federal Deposit Insurance Corporation (the “**FDIC**”) and the Office of the Comptroller of the Currency (the “**OCC**”) each extend its deadline for comments on its respective notice of proposed rulemaking (the “**FDIC Proposed Rules**” and the “**OCC Proposed Rules**”) implementing the stress testing requirements of Section 165(i)(2) of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“**Dodd-Frank**”) to April 30, 2012.

Section 165(i)(2)(C) of Dodd-Frank requires the FDIC and the OCC, in coordination with the Board of Governors of the Federal Reserve System (the “**Federal Reserve**”) and the Federal Insurance Office, to issue consistent and comparable regulations to implement the requirements of this section. The Federal Reserve has proposed stress testing requirements under Section 165(i) of Dodd-Frank as part of its broader notice of proposed rulemaking (the “**Federal Reserve Proposed Rules**”) implementing the enhanced prudential standards and early remediation requirements mandated by Sections 165 and 166 of Dodd-Frank. In light of the range and complexity of the issues addressed in the Federal Reserve Proposed Rules, the Federal Reserve recently extended its deadline for public comments from March 31, 2012 until April 30, 2012.

Our members are actively engaged in a careful review and analysis of the FDIC Proposed Rules and the OCC Proposed Rules, as well as of the Federal Reserve Proposed Rules, and are working diligently to prepare thorough and considered comment letters to each of the FDIC, the OCC and the Federal Reserve. However, we believe that, in light of the substantial overlap and closely intertwined nature of the FDIC Proposed Rules, the OCC Proposed Rules and Federal Reserve Proposed Rules insofar

as they all relate to Section 165(i)'s stress testing requirements, as well as the relationship between the stress testing and other Section 165/166 proposals, all three stress testing related proposals should be considered together and holistically. Moreover, the stress testing requirements of Section 165(i), which apply to banks with total consolidated assets of more than \$10 billion, capture many banks that are less familiar with stress testing and need additional time to review the proposal. Therefore, we respectfully request that the FDIC extend the deadline for comments on the FDIC Proposed Rules from March 23, 2012 to April 30, 2012, and that the OCC extend the deadline for comments on the OCC Proposed Rules from March 26, 2012 to April 30, 2012, which would be consistent with the deadline for comments on the Federal Reserve Proposed Rules.

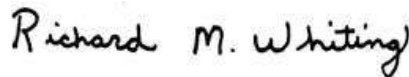
Respectfully submitted,



Dan McCardell  
Senior Vice President and Head of Regulatory Affairs  
The Clearing House Association L.L.C.



Hugh C. Carney  
Senior Counsel  
American Bankers Association



Richard M. Whiting  
Executive Director and General Counsel  
The Financial Services Roundtable

cc: Board of Governors of the Federal Reserve System

## The Associations

### The Clearing House

Established in 1853, The Clearing House is the oldest banking association and payments company in the United States. It is owned by the world's largest commercial banks, which collectively employ over 2 million people and hold more than half of all U.S. deposits. The Clearing House Association L.L.C. is a nonpartisan advocacy organization representing—through regulatory comment letters, amicus briefs and white papers—the interests of its owner banks on a variety of systemically important banking issues. Its affiliate, The Clearing House Payments Company L.L.C., provides payment, clearing, and settlement services to its member banks and other financial institutions, clearing almost \$2 trillion daily and representing nearly half of the automated-clearing-house, funds-transfer, and check-image payments made in the U.S. See The Clearing House's web page at [www.theclearinghouse.org](http://www.theclearinghouse.org).

### American Bankers Association

The American Bankers Association represents banks of all sizes and charters and is the voice for the nation's \$13 trillion banking industry and its two million employees. The majority of ABA's members are banks with less than \$165 million in assets. Learn more at [www.aba.com](http://www.aba.com).

### The Financial Services Roundtable

The Financial Services Roundtable represents 100 of the largest integrated financial services companies providing banking, insurance, and investment products and services to the American consumer. Member companies participate through the Chief Executive Officer and other senior executives nominated by the CEO. Roundtable member companies provide fuel for America's economic engine, accounting directly for \$92.7 trillion in managed assets, \$1.2 trillion in revenue, and 2.3 million jobs.