

TCH Files Comment Letter on Regulators' Proposed Revisions to the Supplementary Leverage Ratio

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Washington, D.C. — June 13, 2014 — Today, The Clearing House Association (TCH) submitted a comment letter to the U.S. banking agencies expressing general support for the agencies' proposed revisions to the supplementary leverage ratio and providing suggestions for additional improvements. Among other points, the comment letter reiterates The Clearing House's continued support for a leverage capital ratio that is intended and functions as a backstop floor to a risk-based approach to capital rather than as a binding capital constraint, either directly or through its incorporation in the Federal Reserve's Comprehensive Capital Analysis and Review (CCAR).

"Although we believe that there are several remaining issues that the agencies can and should clarify or modify, on the whole we believe that by incorporating a number of important improvements made by the Basel Committee, the agencies reproposal lays the groundwork for a balanced, effective and comprehensive leverage ratio regime that appropriately serves as a backstop floor to the risk-based capital framework," said Paul Saltzman, President of The Clearing House Association.

About 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 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 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 which represents 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.