COMMENT LETTER

Regulatory Capital Rules: Expanded Risk-Based Approach & Standardized Approach Proposals

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Jennifer M. Jones, Deputy Executive Secretary
Attention: Comments/Legal OES (RIN 3064-AF29)
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Chief Counsel's Office
Attention: Comment Processing
Office of the Comptroller of the Currency
400 7th Street SW, Suite 3E-218
Washington, DC 20219

Benjamin W. McDonough, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

Re: *Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-Weighted Assets*; *Regulatory Capital Rule: Category I and II Banking Organizations, Banking Organizations With Significant Trading Activity, and Optional Adoption for Other Banking Organizations*

The Conference of State Bank Supervisors ("CSBS")1 provides the following comments on the Notice of Proposed Rulemakings ("proposals" or "proposed rules") issued by the Federal Deposit Insurance Corporation ("FDIC"), the Board of Governors of the Federal Reserve System ("FRB"), and the Office of the Comptroller of the Currency ("OCC") (collectively, the "agencies") titled *Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-Weighted Assets* and *Regulatory Capital Rule: Category I and II Banking Organizations, Banking Organizations With Significant Trading Activity, and Optional Adoption for Other Banking Organizations*.2

CSBS has long supported robust and high-quality capital requirements for the U.S. banking system that are appropriately tailored to the size, risk, and complexity of banking organizations. For this reason, state regulators support the proposals' objectives to enhance the risk sensitivity, consistency, and transparency of the risk-based regulatory capital framework. While the proposals make progress towards enhancing the sensitivity of regulatory

capital requirements, the agencies should take certain steps to further enhance risk sensitivity and consistency, particularly for smaller banks not subject to the proposed expanded risk-based approach ("ERBA"), and to ensure that the proposed capital framework does not lead to an unlevel playing field among banking organizations.3

Read the full comment letter.

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  CSBS is the nationwide organization of state banking and financial regulators from all 50 states, the District of Columbia, and the U.S. territories.

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  OCC, FRB & FDIC, Proposed Rule, *Regulatory Capital Rule: Category I and II Banking Organizations, Banking Organizations With Significant Trading Activity, and Optional Adoption for Other Banking Organizations*, 91 Fed. Reg. 14952 (Mar. 27, 2026) (hereinafter, "ERBA"); OCC, FRB & FDIC, Proposed Rule, *Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-Weighted Assets*, 91 Fed. Reg. 15332 (Mar. 27, 2026) (hereinafter, "Standardized Approach").

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  Unless otherwise specified, the term "smaller banks" refers to banking organizations that are subject to the revised standardized approach and that may opt in to ERBA, and the term "large banks" refers to banking organizations that are subject to ERBA.

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