KEY VOTE ALERT!

U.S. CHAMBER OF COMMERCE
Congressional & Public Affairs
1615 H Street, NW
Washington, DC 20062

202-463-5600

December 19, 2017

TO MEMBERS OF THE U.S. HOUSE OF REPRESENTATIVES:

The U.S. Chamber of Commerce supports H.R. 3312, the "Systemic Risk Designation Improvement Act," which would require that prudential regulations intended to address systemic risk are based on a multifactor risk assessment rather than an arbitrary asset threshold. **The Chamber will consider including votes on, or in relation to, this bill in our annual How They Voted scorecard.**

Section 165 of the Dodd-Frank Act created an arbitrary asset threshold for the application of regulations intended to address systemic risks to financial stability. The use of an arbitrary threshold subjected many midsize and regional banks to systemic risk regulation, despite the fact that they do not generate systemic risk.[1] Main Street businesses depend on mid-size and regional banks for credit and other financial products to get started, sustain operations, manage cash, make payroll, and create well-paying jobs.

H.R. 3312 would replace the arbitrary threshold for systemic risk regulations with a multifactor assessment that considers size, interconnectedness, substitutability, complexity, and cross-jurisdictional activity. Notably, this legislation fully preserves the ability of the Federal Reserve to protect the safety and soundness of any institution through the application of enhanced regulations.

The Chamber urges you to support H.R. 3312 and put Main Street back on the path to success.

Sincerely,

Jack Howard
Senior Vice President
Congressional and Public Affairs

---

[1] *See, e.g.*, Office of Financial Research, BCBS Systemic Importance Indicators Reported by Large U.S. Bank Holding Companies (Feb. 12, 2015), *available at* https://www.financialresearch.gov/briefs/files/OFRbr-2015-01-systemic-importance-indicators-for-us-bank-holding-companies-fig-1.pdf.