

May 18, 2015

Chairman Shelby, Ranking Member Brown and Members of the Banking Committee:

On behalf of the undersigned mid-size and regional banking institutions, we are writing to express our support for the recently proposed Financial Regulatory Improvement Act of 2015. In particular, we applaud Chairman Shelby's efforts to strengthen systemic risk regulation by refining the \$50 billion threshold and the application of enhanced prudential standards under Section 165 of Dodd-Frank. Title II of the bill takes the right approach to refining and targeting the Dodd-Frank Act's focus on institutions that actually present systemic risk. We look forward to working with the Committee on this proposal as it moves forward.

We would like to take this opportunity to explain our traditional banking model and how the current \$50 billion threshold for systemically important banks has a detrimental impact on banks like us. Main Street banks, like the signatories to this letter, are based in communities across the United States, such as Buffalo, Columbus, Evansville, Knoxville, Richmond and Portland. Our banks employ more than 490,000 people, in 25,000 branches and offices and lend approximately \$2 trillion to the local communities we serve.

Our bankers - and indeed our most senior executives - have daily interaction with our customers. We take in local deposits and provide traditional banking products, such as loans and mortgages to consumers and small and mid-size businesses, within specific states or regions that collectively span all 50 states. We have made the necessary risk and compliance investments that support our strategies. Indeed, this is evidenced by the following aspects of our business model:

- Reliance on stable deposit funding
- Revenues are driven by traditional banking activities that are well understood by the bank management and regulators
- Limited or no trading operations or market-making activity

In sum, given our prudent business model, the undersigned banks contribute to economic growth and support financial stability. As evidenced by the recent Office of Financial Research report, none of our institutions could be judged, by any conceivable measure, as systemically important. Yet, on top of an already robust regulatory and supervisory framework that regulators will retain despite any legislation, each of us has been subjected to unnecessary requirements under Dodd-Frank.

The imposition of these demands on our banks does not benefit the public in any appreciable way. To the contrary, these requirements sap resources that we could instead deploy to extend credit and dynamically serve our local communities. Rather than hiring

loan officers and other customer-service providers, we have been compelled to reallocate our budgets and engage quantitative modelers and banking consultants to prove what is already well known – that none of us pose a threat to the financial system.

As Main Street banks, we desire a regulatory regime that encourages safety and soundness and protects consumers. We also seek to foster the much needed banking services that communities need to create jobs. Under the current regulatory regime imposed by Section 165 of Dodd-Frank, we face higher operational costs and are forced to divert capital away from the products we offer and lending that helps businesses expand and create jobs.

Common sense reform to the application of enhanced prudential standards can benefit regulators, Main Street banks and our customers as well as support economic growth. To this end, we encourage the Committee to work together and move forward with improvements to systemic risk regulation. Thank you.

Sincerely,

American Express
New York, NY

BBVA Compass
Birmingham, AL

East West Bank
Pasadena, CA

Arvest Bank
Fayetteville, AR

BOK Financial
Tulsa, OK

Eastern Bank
Boston, MA

Associated Bank
Green Bay, WI

Capital One
McLean, VA

EverBank
Jacksonville, FL

Astoria Bank
Lake Success, NY

Central Bancompany
Jefferson City, MO

Fifth Third Bank
Cincinnati, OH

BancorpSouth
Tupelo, MS

Citizens Bank
Providence, RI

First Citizens Bank
Raleigh, NC

Bank of Hawaii
Honolulu, HI

City National Bank
Los Angeles, CA

First Hawaiian Bank
Honolulu, HI

Bank of the West
San Francisco, CA

Commerce Bank
Kansas City, MO

First Horizon Bank
Memphis, TN

BankUnited
Miami Lakes, FL

Discover Financial
Services
Riverwoods, IL

First Midwest Bank
Itasca, IL

BB&T
Winstom-Salem, NC

First National Bank
Hermitage, PA

First National of
Nebraska
Omaha, NE

First Niagara
Buffalo, NY

FirstBank
Lakewood, CO

FirstMerit Bank
Akron, OH

Flagstar Bank
Troy, MI

Frost Bank
San Antonio, TX

Fulton Financial
Lancaster, PA

Hancock Bank
Gulfport, MS

Huntington
Bancshares Inc.
Columbus, OH

IBERIABANK
Lafayette, LA

International
Bancshares
Laredo, TX

M&T Bank
Buffalo, NY

MB Financial
Chicago, IL

Old National Bank
Evansville, IN

OneWest Bank
Pasadena, CA

Pacific Western Bank
Los Angeles, CA

People's United Bank
Bridgeport, CT

Popular Community
Bank
New York, NY

PNC Bank
Pittsburgh, PA

The PrivateBank
Chicago, IL

Raymond James
Bank
St. Petersburg, FL

Regions Bank
Birmingham, AL

Scottrade Bank
Saint Louis, MO

Signature Bank
New York, NY

Silicon Valley Bank
Santa Clara, CA

SunTrust Banks Inc.
Atlanta, GA

Susquehanna Bank
Lititz, PA

Synovus Bank
Columbus, GA

TCF Bank
Wayzata, MN

Texas Capital Bank
Dallas, TX

Trustmark
Jackson, MS

UMB Financial
Kansas City, MO

Umpqua Bank
Portland, OR

United Bank
Charleston, WV

Valley National
Bank
Wayne, NJ

Webster Bank
Waterbury, CT

Wintrust Financial
Rosemont, IL

Zions Bancorporation
Salt Lake City, UT