



MID-SIZE BANK COALITION OF AMERICA

January 26, 2017

U.S. House of Representatives
Washington, D.C. 20515

The Mid-Size Bank Coalition of America (MBCA) and the Regional Bank Coalition (RBC), along with our members listed at the close of this letter, write to express our strong support for meaningful regulatory relief to support local communities, job creation and economic prosperity nationwide.

It has been over six years since the passage of the Dodd-Frank Act, and the MBCA and RBC, and our members, have been hard at work implementing its requirements, among other new regulations and requirements introduced by regulators. As the process has unfolded, it is clear that many Dodd-Frank provisions are having unintended, adverse consequences that inhibit our ability to successfully meet more of the credit needs of American consumers and businesses consistent with longstanding safety and soundness principles.

While the MBCA and RBC support a regulatory regime that encourages safety and soundness and protects consumers and the financial system, we also seek and are uniquely suited, to foster the much needed banking services that urban and rural communities in all 50 states need in order to create jobs. Many of Dodd-Frank's provisions sap resources that we could instead deploy to extend credit and dynamically serve our communities. We face higher operational costs and are forced to divert capital and funding away from the products we offer and lending that helps businesses expand and create jobs. Rather than hiring loan officers and other customer-service providers, we have been compelled to reallocate our budgets and engage lawyers, quantitative modelers and banking consultants.

Mid-size and regional banks need relief from the unnecessarily burdensome regulatory and supervisory framework, including needless rigorous stress testing, statutory and prudential obligations of Systemically Important Financial Institutions (SIFIs), resolution planning, and many other requirements under Dodd-Frank. The answer is not to eliminate regulations completely but to adapt them based on a bank's business model and risk profile. We need a regulatory framework that has flexibility and adaptability based on all factors that determine a bank's risk—and support the mission of providing capital to small- and mid-size businesses in the United States.

It is time to recognize that one-size-fits-all regulations do more harm than good and move away from definitions that rely on blunt asset thresholds to improperly segment the banking industry. Irrelevant asset thresholds limit traditional banking activity and end up harming the small- and

mid-size business that are the engine of U.S. job creation and economic growth. Again, this country needs regulations that appropriately reflect a bank's business model and risk.

Reform of Dodd-Frank will benefit midsize and regional banks, but more importantly, it will provide new opportunities for our customers and thus support U.S. economic growth. To this end, we encourage you to work with your colleagues in a bipartisan manner to move forward with financial regulatory improvements that fulfill these goals.

Signed,

American Express	New York
Arvest Bank	Fayetteville
Associated Bank	Green Bay
Banc of California, Inc.	Irvine
Banco Popular North America	New York
BancorpSouth, Inc.	Tupelo
Bank of North Carolina	High Point
Bank of the Ozarks, Inc.	Little Rock
Bank of the West	San Francisco
BankUnited, Inc.	Miami Lakes
Banner Bank	Walla Walla
BB&T	Winston-Salem
BBVA Compass	Birmingham
BMO Financial Group	Chicago
BOK Financial Corporation	Tulsa
Bremer Bank	Saint Paul
Cadence Bank	Houston
Capital One	McLean
Cathay Bank	Los Angeles
Cenlar FSB	Ewing
Central Banccompany, Inc.	Jefferson City
Chemical Bank	Midland
Citizens Financial Group	Providence
City National Bank	Los Angeles
Comerica	Dallas
Commerce Bancshares, Inc.	Kansas City
Customers Bank	Phoenixville
Discover Financial Services	Riverwoods
EagleBank	Bethesda
East West Bank	Pasadena
Eastern Bank	Boston
EverBank	Jacksonville

F.N.B. Corporation	Pittsburgh
Fifth Third Bank	Cincinnati
First Citizens Bank	Raleigh
First Financial Bank	Cincinnati
First Hawaiian Bank	Honolulu
First Horizon	Memphis
First Midwest Bancorp, Inc.	Itasca
First National of Nebraska	Omaha
FirstBank	Lakewood
Flagstar Bank, FSB	Troy
Frost Bank	San Antonio
Fulton Financial Corporation	Lancaster
Glacier Bank	Kalispell
Great Western Bank	Sioux Falls
Hancock Holding Company	Gulfport
Huntington Bancshares	Columbus
IBERIABANK	Lafayette
International Bancshares	Laredo
Investors Bancorp, Inc.	Short Hills
M&T Bank	Buffalo
MB Financial Bank	Chicago
MidFirst Bank	Oklahoma City
NBT Bank	Norwich
Northwest Bank	Warren
Old National Bancorp	Evansville
Pacific Western Bank	Beverly Hills
People's United Bank	Bridgeport
PNC Financial Services	Pittsburgh
PrivateBank	Chicago
Provident Bank	Iselin
Rabobank	Roseville
Raymond James Bank	Saint Petersburg
Regions Financial Corporation	Birmingham
Renasant Bank	Tupelo
Scottrade Bank	Saint Louis
Signature Bank	New York
Silicon Valley Bank	Santa Clara
Simmons National Bank	Pine Bluff
South State Bank	Columbia
Sterling National Bank	Montebello
SunTrust Banks	Atlanta

Synovus Bank	Columbus
TCF National Bank	Sioux Falls
TD Bank	Cherry Hill
Texas Capital Bank	Dallas
TowneBank	Portsmouth
Trustmark National Bank	Jackson
UMB Financial Corporation	Kansas City
Umpqua Bank	Roseburg
United Bankshares, Inc.	Charleston
United Community Bank	Blairsville
Valley National Bank	Wayne
Webster Bank	Waterbury
WesBanco, Inc.	Wheeling
Wintrust Financial	Rosemont
Zions Bank	Salt Lake City