

October 20, 2017

The Honorable Mike Crapo  
239 Dirksen Senate Office Building  
Washington, DC 20510

The Honorable Sherrod Brown  
713 Hart Senate Office Building  
Washington, DC 20510

Dear Chairman Crapo and Ranking Member Brown,

We are writing to express support for S.1893, “The Systemic Risk Designation Improvement Act of 2017” introduced by Senators McCaskill (D-MO) and Perdue (R-GA).

This legislation uses the systemic risk measurement methodologies developed by the federal banking regulators to determine the actual risks particular firms present to the financial sector. Such risk profiles would then form the basis for determining whether firms would be subjected to systemic risk regulation. We believe that dynamic, multifaceted analyses provide the most accurate basis for making assessments for regulatory purposes and should be used accordingly.

As regional banks, we play a critical role in our communities, serving as the backbone of economic growth by providing loans and other banking services to Main Street businesses. We operate in all 50 states and are responsible for more than \$1.7 trillion in lending to the local communities in which we operate. Regional banks hold one-quarter of U.S. banking deposits and employ more than 430,000 people in more than 23,000 banking offices throughout the country and have account or credit relationships with more than half of America’s households.

We appreciate your attention to this important legislation and look forward to it advancing in the Senate.

Sincerely,

The Ally logo consists of the word "ally" in a lowercase, purple, sans-serif font.

Jeffrey J. Brown, CEO  
Ally Financial Inc.



**BANK OF THE WEST**  
**BNP PARIBAS**

Nandita Bakhshi, President and CEO  
Bank of the West

The BB&T logo features the letters "BB&T" in a bold, red, serif font.

Kelly S. King, Chairman and CEO  
BB&T

The BBVA Compass logo features the text "BBVA Compass" in a blue, sans-serif font.

Onur Genç, CEO  
BBVA Compass



Christopher Begy, U.S. Country Head and CEO  
BMO Financial Corp.



Richard D. Fairbank, Founder, Chairman and CEO  
Capital One Financial Corporation



Bruce Van Saun, Chairman and CEO  
Citizens Financial Group



Ralph W. Babb Jr., Chairman and CEO  
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David W. Nelms, Chairman and CEO  
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Greg D. Carmichael, President and CEO  
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Stephen D. Steinour, Chairman, President and CEO  
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Beth E. Mooney, Chairman and CEO  
KeyBank N.A.



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William S. Demchak, Chairman, President and CEO  
The PNC Financial Services Group, Inc.



Grayson Hall, Chairman, President and CEO  
Regions Financial Corporation



Scott Powell, CEO  
Santander US



William H. Rogers Jr., Chairman and CEO  
SunTrust



Andy Cecere, President and CEO  
US Bank



Harris H. Simmons, Chairman and CEO  
Zions Bancorporation

CC: Members of the Senate Banking Committee