

COMMENT LETTER

January 16, 2024

ICI Comment Letter on Regulatory Capital Rule: Large Banking Organizations and Banking Organizations with Significant Trading Activity

ICI has filed two letters in response to the joint notice of proposed rulemaking issued by the Board of Governors of the Federal Reserve System, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation (collectively, the Agencies) to amend the capital requirements applicable to certain banking organizations (Proposal). Commonly referred to as the Basel III endgame, the Proposal would implement the final components of the Basel III framework and apply a broader set of capital requirements to more banking organizations, in response to the March 2023 collapse of several regional banks.

The comment letter observes at the outset that ICI typically does not weigh in on matters of banking regulation, particularly the setting of capital requirements, but will do so when ICI has significant concerns as to how a banking proposal may impact regulated funds and collective investment trusts (CITs), their advisers, and the millions of American households that invest in regulated funds and CITs to save for retirement and other important financial goals.

A second letter filed by ICI emphasizes that market liquidity and market-making are fundamental to the efficient operation of financial markets.

Read more in the [comment letter](#) and supplemental [comment letter](#) written by ICI President & CEO Eric Pan and Chief Economist Sean Collins.