



Institute of International Bankers

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## **IIB COMMENTS ON FBO TAILORING PROPOSALS**

*Contact:*

*William Goodwin*

*Communications Director*

646 213 1141 / [wgoodwin@iib.org](mailto:wgoodwin@iib.org)

The Institute of International Bankers (IIB) today submitted three comment letters (see links below) on Federal Reserve Board and inter-agency proposals to tailor enhanced prudential standards and resolution plan requirements for foreign banking organizations, including questions from the agencies on potential branch liquidity requirements.

Following is a statement from IIB CEO Briget Polichene:

“The IIB appreciates the agencies’ efforts to better tailor regulations imposed on international banks, but believes the proposals should be revised to meet statutory mandates to respect the internationally-agreed principles of national treatment and equality of competitive opportunity, and to take into account comparable home-country regulation. While some international banks will receive appropriate relief under the tailoring proposals, the net effect is negative for most international banks. It is essential that tailoring be done right to allow international banks to continue to play a vital role in providing credit to U.S. businesses, enhancing liquidity to financial markets, and contributing to the employment of hundreds of thousands of people in the United States. We also believe Federal and state regulators have ample tools to address U.S. branch liquidity and protect financial stability. New requirements would duplicate existing home-country requirements and could further fragment market liquidity, resulting in a less resilient global financial system.”

--Briget Polichene

CEO

Institute of International Bankers

Attachments:

[FINAL IIB FBO Tailoring Proposal Comment Letter](#)

[FINAL Appendices to the IIB FBO Tailoring Proposal Comment Letter](#)

[FINAL IIB Branch Liquidity Letter](#)

[FINAL IIB Resolution Plan Comment Letter](#)