



February 5, 2018

Dear Senator Shaheen:

On behalf of The New England Council and our members, I write today to urge you to support S.2155, the Economic Growth, Regulatory Relief, and Consumer Protection Act. This strong bipartisan legislation would provide much needed regulatory relief for the financial services industry throughout New England.

The Council has long supported protections the *Dodd-Frank Act* created for American consumers, guaranteeing that their financial assets are secure. However, we believe that such financial regulations can be improved by ensuring that they are not overly burdensome on banking institutions, especially the smaller ones. The Council and our members have strongly supported the bipartisan process the Senate has taken towards drafting S.2155; we feel that this is the best approach to improve upon the financial regulations currently in place.

The New England region is home to many financial institutions that would benefit from S.2155. Below are the provisions of this bill that we feel would not only benefit our members, but also financial institutions throughout the New England region.

Section 101 – Minimum Standards for Residential Mortgage Loans: If passed, certain mortgage loans would be deemed qualified mortgages under the Truth in Lending Act (TILA). To qualify, loans would need to be created and managed by an insured depository institution or an insured credit union with less than \$10 billion in total consolidated assets.

Section 105 – Credit Union Residential Loans: If passed, this provision would exempt 1 to 4 non-owner occupied loans from being counted as a member business loan for credit unions under the Federal Credit Union Act. These loans would then be considered mortgages, which would free up small business lending capacity.

Section 203 – Community Bank Relief: If passed, banking entities would be exempt from Section 13 (Volcker Rule) of the Bank Holding Company Act if they meet certain community bank requirements related to assets, trading assets and trading liabilities.

Section 210 – Examination Cycle: If passed, the asset threshold would be increased from \$1 billion, to \$3 billion for an 18-month exam cycle for well managed and well capitalized banking institutions.

Section 401 – Enhanced Prudential Standards for Certain Bank Holding Companies: If passed, this provision would increase the systemically important financial institution (SIFI) threshold from \$50 billion to \$250 billion.

The New England Council

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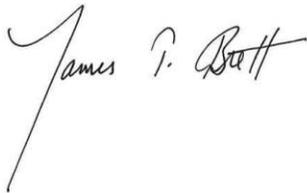
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Additionally, we urge that the Senate to update **Section 212 - International Insurance Capital Standards Accountability**. The Council's insurance industry members feel that aligning these provision with elements of H.R. 4537, the International Insurance Standards Act, would take important steps toward ensuring that one-size-fits-all international capital and regulatory standards do not encroach upon the U.S. state-based system.

The post-economic crisis regulations have significantly improved the stability and resilience of the financial sector. As Congress continues to pursue their Financial Regulatory Reform initiative, we ask that you take these recommendations into consideration and support S. 2155.

We are proud of our members who work and contribute to the financial services community, and know that they strive every day to put their customers first. We thank you for your consideration and support on this issue. If you have any questions regarding this matter, please contact me at 617-723-4009.

Sincerely,

A handwritten signature in cursive script that reads "James T. Brett". The signature is written in black ink and is positioned below the word "Sincerely,".

James T. Brett
President & CEO