

March 2, 2018

Chairman Mike Crapo

U.S. Senate Committee on Banking, Housing, and Urban Affairs
534 Dirksen Senate Office Building
Washington, D.C. 20510

Ranking Member Sherrod Brown

U.S. Senate Committee on Banking, Housing, and Urban Affairs
534 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Chairman Crapo and Ranking Member Brown:

I am writing to express Comerica's strong support for S. 2155, the *Economic Growth, Regulatory Relief and Consumer Protection Act*, which is scheduled for consideration before the Senate next week.

Comerica Incorporated is a \$72 billion asset financial services company headquartered in Dallas, Texas, and strategically aligned by three business segments: The Business Bank, The Retail Bank, and Wealth Management. Comerica's 8,000 colleagues focus on customer relationships and the company operates under a simple business model, with a strong focus on commercial lending.

When the Dodd-Frank Act was passed in 2010, Comerica reported assets of \$55 billion. As a result, the company was the second-to-last bank 'pulled in' by the arbitrary \$50 billion SIFI threshold in the bill, and thus has been subject to the accompanying enhanced prudential standards of Section 165. The compliance costs have been tremendous, especially for a regional bank of our size. And while the largest banks can easily absorb this type of expense, it has an outsized impact on smaller institutions like Comerica.

Fortunately, there is strong bipartisan recognition that the current \$50 billion SIFI threshold misses the mark, as it groups regional banks with large, complex banks with more than \$1 trillion in assets. S. 2155 increases the SIFI threshold from \$50 billion to \$250 billion, while still giving regulators the tools and flexibility that they need to ensure the safety and soundness of institutions with less than \$250 billion in assets. We believe this change is a major step toward the kind of regulatory relief that will potentially allow Comerica to increase lending to consumers and businesses, reduce compliance expenses, and allow us to manage capital and liquidity to meet our customer's needs in a more prudent and efficient manner.

This important piece of legislation will also help spur economic growth on a macro scale. Since regional and small banks serve as a catalyst for economic growth, the impact will be significant.

We urge members of the Senate to support S. 2155 and pass this important bill as quickly as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph", written in a cursive style.

Ralph W. Babb, Jr.
Chairman and Chief Executive Officer
Comerica Incorporated