Wayne A. Abernathy



Building Success. Together.

Bank Competencies

- Financial Intermediation: Savers/Borrowers
- Maturity Transformation
- Custodial Services
- Trust Services
- The Payments System
- Capital Formation
- Liquidity Provision
- Cash Management
- Government Finance
- Wealth Management



Repeated Congressional Reaffirmation

- National Bank Act: 1863, 1864 (OCC)
- Federal Reserve Act: 1913
- Federal Home Loan Bank Act of 1932
- The Banking Act of 1933 (FDIC)
- Gramm-Leach-Bliley Act: 1999
- Dodd-Frank Act: 2010



Diversity of Banks For a Diversity of Customers

- Community Banks
- Regional Banks
- Money Center Banks
- International Banks
- Retail Banks
- Wholesale Banks
- Industrial Loan Companies
- Bankers Banks
- National Banks
- State Chartered Banks
- State Chartered Savings Banks
- State Chartered Mutual Savings Banks
- Federal Savings Associations
- Trust Banks

- State Chartered Trust Companies
- Custodial Banks
- Federal Mutual Savings Associations
- Private Banks
- Publicly-Traded Banks
- Privately-Held Banks
- S-Corporation Banks
- CDFI Banks
- Ag Banks
- Credit Card Banks
- Internet Banks
- Edge Act Corporations
- Agreement Corporations
- Foreign Bank Branches



Safety and Soundness

CAMELS



Safety and Soundness

CAM LS



Changing Regulatory Attitudes

- Fed/OCC beating back Basel projects such as interest rate risk, step-in risk
- Fed stress test reforms (Reforming the Reforms)
- OCC Innovation, Bank Advantages
- FDIC encouragement for *de novos*
- BCFP recognizes value of banks for small dollar lending
- FFIEC Call Reports Reform



Elections & Reshuffling the Deck

- Accelerating Economic Growth: Banks Wanted
- Bank bashing is stale, lacks public interest
- Prudential reforms too complex for regulators & banks



Executive Memos and Orders

- Priebus Reg Pause Memo
 Hiring Freeze Memo
- 2-4-1 Executive Order
- Core Principles Executive Order



President Trump's Core Principles

- (a) Empower Americans
- (b) Prevent Bailouts
- (c) More Rigorous Analysis
- (d) American Competitiveness
- (e) U.S. Interests in Global Confabs
- (f) Efficient, Effective, Tailored Regulation
- (g) Accountability, Rationalized Framework



Our Task: Feed the Growth Opportunities

- Specific recommendations to reform the reforms: stress tests, capital regulation, liquidity, mortgage finance
- Put brakes on Basel
- Realization of FDIC hopes for de novos
- Institutionalize reg relief as ongoing exercise, Call Report reform as a model

