

**CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA**

NEIL L. BRADLEY
SENIOR VICE PRESIDENT &
CHIEF POLICY OFFICER

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March 21, 2018

The Honorable Jeb Hensarling
Chair
Committee on Financial Services
U.S. House of Representatives
Washington, DC 20515

The Honorable Maxine Waters
Ranking Member
Committee on Financial Services
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Hensarling and Ranking Member Waters:

The U.S. Chamber of Commerce supports several bills that are scheduled for markup on March 21, 2018, and appreciates the Committee's continued commitment to modernize the financial regulatory structure to benefit investors, consumers, and entrepreneurs. In particular, the Chamber supports:

H.R. 4861, the "Ensuring Quality Unbiased Access to Loans (EQUAL) Act of 2018," which would nullify damaging guidance finalized by the Federal Deposit Insurance Corporation (FDIC) that overregulated deposit advance products and pushed them out of existence. Last fall, the Office of the Comptroller of the Currency rescinded its virtually identical guidance. At the time, then-Acting Director Keith Noreika stated, "The guidance may even hurt the very consumers it is intended to help, the most marginalized, unbanked and underbanked portions of our society." It is vital that Americans continue to have access to small dollar loans within the mainstream banking system.

H.R. 5051, the "Public Company Registration Threshold Act," which would increase from 500 to 2,000 the number of non-accredited shareholders a company must have before being required to register with the Securities and Exchange Commission (SEC). This legislation would build on the "2012 Jumpstart our Business Startups (JOBS) Act," and would help many companies, including companies that raise money through crowdfunding and the private markets from having to undergo costly registration with the SEC.

H.R. 4659, "to require the appropriate Federal banking agencies to recognize the exposure-reducing nature of client margin for cleared derivatives," which would appropriately provide an offset for client initial margin for cleared derivatives in the supplemental leverage ratio (SLR) calculation. The current SLR approach fails to recognize that client initial margin reduces leverage exposure and mitigates risk. The unnecessary cost of holding capital against initial margin is creating a disincentive for central clearing as well as leading to increased costs for end-users.

H.R. 5323, the “Derivatives Fairness Act,” which would harmonize and level the playing field with Europe by eliminating the Credit Valuation Adjustment (CVA) calculation for derivatives transactions.

Taken together, these bills would provide greater credit access to consumers, help businesses raise the capital they need to grow and expand, and fix some of the unintended consequences of regulation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Neil L. Bradley", with a stylized flourish at the end.

Neil L. Bradley

cc: Members of the Committee on Financial Services