

CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA

NEIL L. BRADLEY
EXECUTIVE VICE PRESIDENT &
CHIEF POLICY OFFICER

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April 10, 2018

TO THE MEMBERS OF THE U.S. HOUSE OF REPRESENTATIVES:

The U.S. Chamber of Commerce supports H.R. 4293, the “Stress Test Improvement Act of 2017,” which would streamline and improve stress testing conducted as part of two related exercises: the Dodd-Frank Act Stress Test (DFAST) and the Federal Reserve’s Comprehensive Capital Analysis and Review (CCAR).

The Chamber believes stress testing is an important tool that can promote the safety and soundness of individual depository institutions and the overall resiliency of the banking system. However, it has been implemented in a manner that imposes unnecessary burdens without providing commensurate benefits.

Reforms in the Stress Test Improvement Act include eliminating the unnecessary “adverse” set of conditions while maintaining the stricter “severely adverse” set, establishing that objections to a capital plan must be based on quantitative grounds, and providing for annual company-run tests. We are pleased this legislation reflects several of the Chamber’s stress test reform [recommendations](#).

H.R. 4293 would preserve federal banking regulators’ ability to ensure the safety and soundness of regulated institutions. We urge its expeditious consideration and passage.

Sincerely,

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

Neil L. Bradley