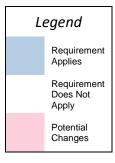
Exhibit APotential Enhanced Prudential Standards for Large Banks

Regulatory Requirement	Category I BHC	Category II BHC	Category III BHC	Category IV BHC	Other BHC			
Resolution Planning								
165(d) Resolution Planning ¹								
Capital Requirements								
TLAC/Long-term debt								
GSIB surcharge								
Enhanced Supplementary leverage ratio								
Advanced approaches								
AOCI opt-out not available								
Supplementary leverage ratio								
Countercyclical capital buffer								
Standardized approach								
Tier 1 leverage ratio								
Capital Stress Testing								
Supervisory stress testing	Annually	Annually	Annually	Annually ²				
Company-run stress testing	Annually	Annually	Biennially ³	Annually or Biennially				
Annual capital plan	Annually	Annually	Annually	Annually				
FR Y-14								
Liquidity and Related Requirements								
LCR and NSFR			If wSTWF <\$75b: Reduced (85%), else full (100%) ⁴	Applicability of LCR/NSFR regardless of wSTWF, with potential modifications (full vs. reduced, daily vs.				



- ¹ Currently, Category IV U.S. firms are not required to submit 165(d) resolution plans; rather, any FBO with at least \$250 billion in global consolidated assets but not within Category II or III must submit a 165(d) plan as a triennial reduced filer. To the extent that a banking organization has an insured depository institution subsidiary with \$100 billion or more in total consolidated assets, that entity would need separately to file an IDI resolution plan with the FDIC.
- ² Currently only applies biennially.
- Such banking organizations are still required to conduct an internal stress test, and report the results on the FR Y-14A in connection with its annual capital plan submission. To the extent Category IV firms are required to do annual company-run stress testing, we would expect a corresponding change for Category III firms.
- To the extent Category IV standards are increased beyond those that currently apply to Category III firms, these also would be revised.

Regulatory Requirement	Category I BHC	Category II BHC	Category III BHC	Category IV BHC	Other BHC			
				monthly) based on wSTWF.5				
Internal liquidity stress testing	Monthly	Monthly	Monthly	Monthly ⁶				
Liquidity risk management				Untailored ⁷				
Liquidity Buffer								
FR 2052a	Daily (T+2)	Daily (T+2)	Daily (T+2) if wSTWF ≥\$75b, otherwise monthly (T+2)	Daily/Monthly T+2/T+10 based on wSTWF. ⁸				
Other Enhanced Prudential Standards								
Single counterparty credit limits	More stringent GSIB to GSIB limit applies							
Risk Committee Requirement					Applies to U.S. BHCs with total consolidated assets of \$50 billion or more			
Risk Management Requirements								
FR Y-15								



Requirement Applies

Requirement Does Not Apply

Potential Changes Currently, neither the LCR nor NSFR would apply to a Category IV BHC to the extent its wSTWF was less than \$50 billion, and then is only required to calculate its LCR on a monthly basis. Other possibilities could be to revise the wSTWF metric with more stringent risk weights for uninsured corporate deposits (which would affect all firms), or maintaining the current thresholds but requiring a higher outflow multiplier and/or moving to a daily calculation.

Currently, this only applies quarterly.

Currently, this is tailored.

Currently applies to Category IV firms on a monthly (T_10) basis. Although Vice Chair Barr did not mention this in his testimony, the FR 2052a is likely to change to match any changes in the LCR.