

## Exhibit A

### *Potential 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 <sup>1</sup>					
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 <sup>2</sup>	
Company-run stress testing	Annually	Annually	Biennially <sup>3</sup>	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%) <sup>4</sup>	Applicability of LCR/NSFR regardless of wSTWF, with potential modifications (full vs. reduced, daily vs.	

#### **Legend**

	Requirement Applies
	Requirement Does Not Apply
	Potential Changes

<sup>1</sup> 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.

<sup>2</sup> Currently only applies biennially.

<sup>3</sup> 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.

<sup>4</sup> 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. <sup>5</sup>	
Internal liquidity stress testing	Monthly	Monthly	Monthly	Monthly <sup>6</sup>	
Liquidity risk management				Untailored <sup>7</sup>	
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. <sup>8</sup>	
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					

<i>Legend</i>	
	Requirement Applies
	Requirement Does Not Apply
	Potential Changes

<sup>5</sup> 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.

<sup>6</sup> Currently, this only applies quarterly.

<sup>7</sup> Currently, this is tailored.

<sup>8</sup> 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.