

ES151296

**Congress of the United States**  
**Washington, DC 20515**

January 16, 2014

The Honorable Ben S. Bernanke  
 Chairman, Board of Governors  
 Federal Reserve System  
 20<sup>th</sup> Street and Constitution Avenue  
 Washington, D.C. 20051

CLO: #B - 14  
 CCS: 14-0457  
 RECVD: 1/23/14

The Honorable Thomas J. Curry  
 Comptroller of the Currency  
 250 E. Street S.W.  
 Washington, D.C. 20219

The Honorable Martin J. Gruenberg  
 Chairman, Federal Deposit Insurance Corporation  
 550 17<sup>th</sup> Street NW  
 Washington, D.C. 20429

The Honorable Mary Jo White  
 Chairman, Securities Exchange Commission  
 100 F Street NE  
 Washington, D.C. 20549

The Honorable Mark P. Wetjen  
 Acting Chairman, Commodity Futures Trading Commission  
 Three Lafayette Center  
 1155 21<sup>st</sup> Street  
 Washington, D.C. 20581

Re: Unintended Consequences of the Volcker Rule

Dear Chairman Bernanke, Comptroller Curry, Chairman Gruenberg, Chairman White and Acting Chairman Wetjen:

We believe the rule finalized on December 10, 2013 pursuant to Section 619 of the Dodd-Frank Act, commonly referred to as the Volcker Rule, carries with it unintended consequences that will adversely impact several Oklahoma banks. These banks, as well as other community banks around the country, had no role in, or responsibility for, the near-collapse of the nation's financial system in 2008. For this reason, small banks should not be negatively impacted by a rule that Congress did not intend for them. We support your efforts to promptly issue an interim final rule to grandfather most Trust Preferred Securities (TruPS) held in collateralized debt obligations (CDOs) that were issued by smaller financial institutions. We also encourage you to proceed with caution when implementing the provisions of the final Volcker rule, as new unintended consequences are likely to emerge.

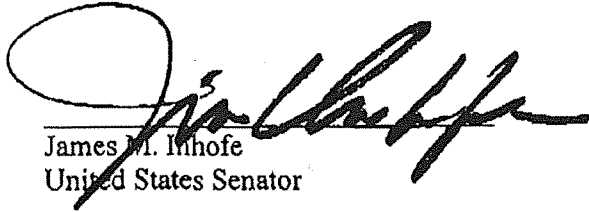
The final rule's treatment of TruPS CDOs would have had a negative - in some cases even detrimental - impact on how small banks account for their earnings and capital. We appreciate your immediate attention to this issue and your recognition that the financial security and viability of these small financial institutions would have been threatened had


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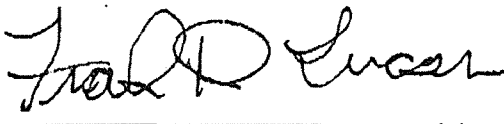
the provisions affecting TruPS CDOs not been clarified. Issuing an interim final rule was the responsible approach. We strongly encourage you to allow the Interim final rule to go into effect immediately following the close of the comment period, and to act as expeditiously in the future when other unintended consequences of a nearly 1,000-page final rule are identified.


Thank you for your prompt and warranted attention to this important issue. We respectfully ask that this letter be entered in the public comment docket for the interim final rule.

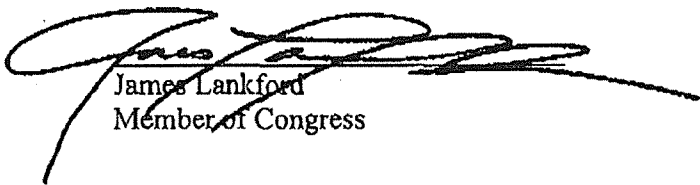
Sincerely,

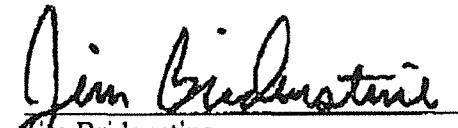
  
James M. Inhofe  
United States Senator

  
Tom Coburn, M.D.  
United States Senator

  
Frank D. Lucas  
Member of Congress

  
Tom Cole  
Member of Congress

  
James Lankford  
Member of Congress

  
Jim Bridenstine  
Member of Congress

  
Markwayne Mullin  
Member of Congress