



May 26, 2011

By Electronic Submission

Office of the Comptroller of the Currency
250 E Street, S.W.
Mail Stop 1-5
Washington, D.C. 20219

Ms. Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Ave., N.W.
Washington, D.C. 20551

Mr. Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429

Alfred M. Pollard, Esq.
General Counsel
Federal Housing Finance Agency
1700 G Street, N.W.
Washington, D.C. 20552

Ms. Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

Regulations Division
Office of General Counsel
Department of Housing and Urban Development
451 7th Street, S.W.
Room 10276
Washington, D.C. 20410-0500

Re: Request for an Extension of the Comment Period for Credit Risk Retention Proposed Rulemaking

Ladies and Gentlemen:

The Loan Syndications and Trading Association (“LSTA”) is the trade organization for the corporate loan market, representing more than 300 member firms including U.S. and foreign banks, institutional investors, law firms, accounting firms and other entities engaged in the syndicated loan market. The LSTA appreciates the regulators’ efforts to develop the Proposed Rules implementing the Risk Retention Provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act. It is clear that the Proposed Rules could profoundly impact the syndicated loan market, and the cost and availability of credit. Considering the enormity of the possible impact, the LSTA believes it is important that there be sufficient time to provide well-considered feedback to the Notice of Proposed Rulemaking. To that end, the LSTA respectfully requests that the Risk Retention comment deadline be extended for 30 days beyond its currently proposed June 10, 2011 deadline.

Sincerely,

Bram Smith
Executive Director
LSTA