



**AUSTRALIAN BANKERS' ASSOCIATION INC.**

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16 April 2010

Secretariat of the Basel Committee on Banking  
Supervision  
Bank for International Settlements  
CH-4002 Basel  
Switzerland

Dear Secretariat,

**Consultative proposals to strengthen the resilience of the banking  
sector**

The Australian Bankers' Association (ABA) welcomes the opportunity to comment on the Committee's consultative proposals to strengthen the resilience of the banking sector, announced on 17 December 2009.

Please find attached our submissions on the Committee's consultative documents, *Strengthening the resilience of the banking sector* and *International framework for liquidity risk measurement, standards and monitoring*.

There has been very extensive member bank engagement and consultation on the drafting of these submissions, with detailed analysis of all aspects of the Committee's proposals, the position of Australian banks, and the possible impact of the proposed reforms on the economy as a whole

The ABA looks forward to opportunities for further engagement and consultation on these critical proposals, with the Committee and with Australian regulators.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Steven Münchenberg', is written over a large, stylized, hand-drawn triangle.

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**Steven Münchenberg**

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