

September 10, 2010



Dr. Arnout Wellink
Chairman
Basel Committee on Banking Supervision
Bank of International Settlements
Centralbankplatz 2
CH 4002 Basel, Switzerland

1333 H Street, NW, Suite 800E
Washington, DC 20005-4770

TELEPHONE 202.857.3600

FAX 202.775.1430

WEB iif.com

Dear Chairman Wellink:

On behalf of the IIF Steering Committee on Regulatory Capital, chaired by Stephen Green, Group Chairman of HSBC, we would like to submit this detailed response to the Basel Committee Consultative Document *Countercyclical Capital Buffer Proposal*.

The IIF welcomes the Basel Committee's proposals and the opportunity to comment on them, and the Steering Committee and members of its working groups on Capital Adequacy and Macroeconomic Effects would be happy to work with the Committee on the finalization and implementation of the proposals in order to ensure the effectiveness of any buffer regime.

Please do not hesitate to contact me directly with any questions or issues regarding this response at +1.202.857.3312 or dschraa@iif.com

Very Truly Yours,

David Schraa
Director, Regulatory Affairs
Institute of International Finance

Cc: Stefan Walter, Secretary General, BCBS
Karl Cordewener, Deputy Secretary General, BCBS
William B. Coen, Deputy Secretary General, BCBS