

Implementing Dodd-Frank: Time for a Better Supervisory Fit

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Secretary Geithner's Six Principles

1. An obligation of speed
2. Full transparency and disclosure
3. Don't layer new on old
4. Don't risk killing innovation
5. More level playing field
6. a. Coordination to regulatory process
b. Assess overall burden/benefits

Other Measures of Dodd-Frank

- 1. End TBTF**
- 2. Foresee and Forestall Systemic Risk**
- 3. Unify Consumer Protection**
- 4. Address Existing Sources of Excessive Risk**

Diversity of Banks

For a Diversity of Customers

- Community Banks
- Regional Banks
- Money Center Banks
- International Banks
- Retail Banks
- Wholesale Banks
- Bankers Banks
- National Banks
- State Chartered Banks
- State Chartered Savings Banks
- Federal Savings Associations
- Industrial Loan Corporations
- Federal Mutual Savings Associations
- State Chartered Mutual Savings Banks
- Private Banks
- Trust Banks
- Custodial Banks
- Publicly-Traded Banks
- Privately-Held Banks
- S-Corporation Banks
- CDFI Banks
- Ag Banks
- Credit Card Banks
- Edge Act Corporations
- Agreement Corporations
- Foreign Bank Branches

Ten Key Principles For Modern Bank Supervision

1. Banks are intermediaries
2. Graduated/scalable supervision
3. No competitive disadvantages
4. Artificial thresholds disadvantage customers
5. Carve outs don't work
6. Greater transparency in supervision
7. Rigorous cost/benefit analysis
8. Consider rules individually and collectively
9. Quick dispute resolution
10. The alternative to diversity is consolidation