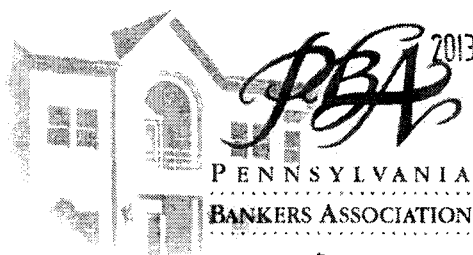


RECEIVED
IRRC



2013 OCT -8 AM 8: 59

3021-

DANIEL J. REISTETER
Vice President of Government Relations
Tel. (717) 255-6933
FAX: (717) 233-5937
E-mail: dreisteter@pabanker.com

October 7, 2013

Office of Chief Counsel
Department of Banking and Securities
Attention: Public Comment on Regulation 3-51,
17 N. Second Street, Suite 1300
Harrisburg, PA 17101-2290

Dear Sirs:

The Pennsylvania Bankers Association (PBA) appreciates the opportunity to provide comments on the PA Department of Banking and Securities proposed rulemaking #3-51 "Assessments" (IRRC #3021) as published in the Pennsylvania Bulletin on September 14, 2013.

The Pennsylvania Bankers Association is the statewide trade association representing approximately 150 financial institutions of all sizes located throughout the Commonwealth including national and state banks, bank and trust companies, trust companies, savings institutions, and their subsidiaries and affiliates.

As noted in the proposal, the Department seeks to "implement an assessment schedule for State-chartered institutions which would provide adequate and sustainable funding for the Department and streamline reporting and billing requirements on State-chartered institutions by eliminating examination-based billing for State-chartered credit unions and State-chartered trust companies."

Further, the Department indicates that "the proposed rulemaking would increase the assessments paid by the regulated community to the Department for the first time since the 1990s. Upon full implementation, the assessments paid by nearly all State-chartered institutions will still be significantly lower than current assessments paid by similar Federally-chartered institutions operating in this Commonwealth."

PBA appreciated the opportunity to be informed of this proposal during its development by the Secretary of Banking and Securities and his staff. During PBA's discussions with the Department we suggested that the proposal and accompanying explanatory materials highlight the efficiencies the Department has achieved since 2011 and that these be communicated directly to all state chartered institutions. The Secretary has since communicated directly with all state chartered institutions affected by this proposal and has provided a well reasoned rationale for it.

The importance of maintaining the integrity and independence of the Banking Department Fund from the rest of the Commonwealth's General Fund budget is strongly supported by the PBA and we will continue to urge the Administration and General Assembly to do so.

While we cannot comment on the impact this proposal will have on individual state chartered member institutions, PBA does believe this proposal will ensure that the Department will receive adequate funding into the future.

Thank you again for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink that reads "Daniel J. Reisteter". The signature is written in a cursive style with a large, stylized 'D' and 'R'.

Daniel J. Reisteter
Vice President Government Relations