Aggregate deficit if Basel III were fully implemented today Excludes institutions over \$250B, BHCs with less than \$500M in assets Amount (\$B)

Years to meet Basel III requirements based on an assumed minimum of 5% return on average common equity.

Average years to meet Basel III requirements through earnings

As of July 2, 2014. RWA = risk-weighted assets

Source: SNL Financial

Results assume fully phased-in capital rules.

Banks with \$15B - \$250B in assets	0.00	0.12	0.00
Banks with <\$15B in assets	0.86	1.23	1.59
Total deficit	0.86	1.35	1.59
Median years to meet Basel III requirements through earnings	1.11	0.95	

1.11 0.95 3.08 2.56

Calculations based on universally applied assumptions regarding deferred tax assets, nonqualifying capital instruments, accumulated other comprehensive income and

Conservative

Percent of RWAs (%)

Conservative

0.92

1.31

1.26

Moderate

high-volatility commercial real estate. Based on 2014 first-guarter regulatory financials for top-tier banks and thrifts. Excludes American Express Co. and Northern Trust Corp., which filed capital results under Basel III for the guarter ending March 31, 2014. Also excludes thrift holding companies and bank holding companies with a foreign parent, as well as industrial, cooperative and nondepository trust banks. Excludes companies with adjusted Texas ratios of more than 100% or negative average common equity over the last 12 months.

Moderate