

**Aggregate deficit if Basel III was fully implemented today**  
**Excludes institutions over \$250B and BHCs less than \$500M in assets.**

	Amount (\$B)		Percent of RWAs	
	Moderate	Conservative	Moderate	Conservative
Banks with \$15B - \$250B in assets	0.00	0.00	0.00	0.00
Banks with <\$15B in assets	0.62	0.99	1.13	0.85
<b>Total deficit</b>	<b>0.62</b>	<b>0.99</b>	<b>1.13</b>	<b>0.85</b>
Median years to meet Basel III requirements through earnings	0.91	0.75		
<b>Average years to meet Basel III requirements through earnings</b>	<b>2.33</b>	<b>1.94</b>		

As of Sept. 5, 2014.

Calculations based on universally applied assumptions regarding deferred tax assets, nonqualifying capital instruments, accumulated other comprehensive income and high-volatility commercial real estate.

Based on second-quarter 2014 regulatory financials for top-tier BHCs.

Excludes American Express Co. and Northern Trust Corp., which filed capital results under Basel III for the quarter ending June 30, 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.

Years to meet Basel III requirements based on an assumed minimum of 5% ROACE.

Results assume fully phased-in capital rules.

Source: SNL Financial

