

Dear Sirs

We refer to the Consultation Paper issued on 9 November 2012, EBA-CP-2012-11 "Draft Regulatory Technical Standards On own Funds under the draft Capital Requirements Regulation - Part Two".

While we do not wish to offer any comments on the terms of the Consultation itself, we do wish to request that provision be made which would ensure that Airdrie Savings Bank (the last savings bank left in the UK) is included within the institutions covered by the proposals. In order to achieve this, we would suggest that the following entry be added under the categories of savings banks listed in Article 3a:

"in the United Kingdom: institutions registered as a savings bank under the Savings Bank (Scotland) Act 1819."

Airdrie Savings Bank continues to operate under this 1819 legislation which is still on the UK statute books; the Act is available at [www.legislation.gov.uk/ukpa/Geo3/59/62/data.pdf](http://www.legislation.gov.uk/ukpa/Geo3/59/62/data.pdf)

Airdrie Savings Bank is an Associate Member of the UK's Building Societies Association. The BSA drew the omission to our attention and we are aware that the BSA plan to include comments on this matter within their overall response to the Consultation. In view of our direct interest in this, however, we took the view that it is appropriate for us also to comment separately and we will be happy to respond to any questions you may have.

Yours faithfully

Jim Lindsay  
Chief Executive Officer  
Airdrie Savings Bank