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By -

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 Excerpt: . . . 2 tions that do not have the resources to turn the sophisticated mod-els required by Basel II could be forced to consolidate their oper-ations or to severely limit the types of products they offer. One of my primary concerns is the operational risk capital charge that will come under Pillar I of Basel II. This is a new cap-ital charge which will be included with charges for credit risk and interest rate risk. Operational risk includes in its calculus possible losses from employee misconduct, fraud, system failure and litiga-tion risk. These factors are very difficult to quantify for large banks, and nearly impossible to measure for smaller and medium-sized banks. So I question the logic of imposing a burdensome cap-ital charge on institutions that is based mostly in theory, rather than on hard facts. Some have asserted that operational risk is simply the catch-all category of Basel II and has been included simply to define risks that are already accounted for in the capital accounts of most insti-tutions. I would like to see if it would make more sense to include these risks under a...



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