

October 25, 2006

MEMORANDUM TO: Executive Secretary

FROM: Kymberly K. Copa
Senior Counsel, Legal Division, FDIC

SUBJECT: Meeting with Representatives of the American Bankers Association to Discuss Deposit Insurance Reform Implementation and Other Miscellaneous Issues

Please include this memorandum in the public files on the Notice of Proposed Rulemaking (NPR) on the One-time Assessment Credit, the NPR on Dividends, the NPR on Procedural and Operational Changes to Assessments Regulations, the NPR on Risk-Based Assessments, the NPR on the Designated Reserve Ratio, and the NPR on Advertisement of Membership.

On September 12, 2006, representatives of the American Bankers Association (ABA) and member banks met with FDIC staff to discuss the FDIC's implementation of deposit insurance reform legislation, including the status of rulemakings on the one-time assessment credit, dividends, procedural and operational changes to the assessments regulations, the logo and advertisement of membership, the designated reserve ratio, and risk-based assessments. FDIC staff also briefly updated the attendees as to the status of the proposed Interagency Guidance on Nontraditional Mortgage Products, the proposed Interagency Proposal on the Classification of Commercial Credit Exposures, the proposed rule on risk-based capital requirements in the United States for large, internationally active banking organizations (also known as Basel II), and the request for comments on industrial loan companies and industrial banks.

Finally, FDIC staff encouraged the attendees to file specific comments on any of the pending matters open for comment at that time.