

January 19, 2011

TO: The Executive Secretary's Section

FDIC Legal Division

FROM: Andrew Felton

Acting Chief, Large Bank Pricing Section

Division of Insurance and Research

SUBJECT: Teleconference with American Bankers Association (ABA) on Large Bank

Pricing System RIN 3064-AD66, 75 FR 72612 (November 24, 2010).

The FDIC published in the Federal Register a Notice of Proposed Rulemaking (NPR) requesting comment on its proposal to revise the assessment system applicable to large insured depository institutions to better differentiate institutions and take a more forward-looking view of risk; to better take into account losses that the FDIC may incur if an institution fails; and to make technical and other changes to the rules governing the risk-based assessment system.

A telephone conference was held with the ABA and 52 financial institutions and other parties on December 20, 2010, to discuss the NPR for large bank pricing. The telephone conference focused on answering various questions related to the NPR that were submitted to the ABA by their member institutions. Follow-up and additional questions were also addressed. A recording of the conference will be posted on the FDIC's website. In addition, the participants were encouraged to submit written comments by the January 3, 2011 deadline as outlined in the NPR.

FDIC Staff and Industry Participants Include the Following:

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Diane Ellis, Deputy Director	FDIC
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American Bankers Association

American Express Bank

Ameriprise Financial

Arvest Bank

Associated Bank

Astoria Federal Savings

Banco Popular de Puerto Rico

Bank of America

Bank of New York Mellon

Bank of Puerto Rico

Bank of the West

BB&T

BBVA Compass

Capital One

Citigroup

Citizens Financial Group

Clearing House

Comerica Bank

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Discover

E-Trade Bank

Federal Financial

Financial Services Roundtable

First Niagara Bank

First Tennessee Bank

Flagstar Bank

Goldman Sachs

HSBC

Huntington National Bank

ING Direct



JP Morgan Chase

KeyBank

Law Firm of Paul Hastings

MetLife Bank

MidFirst Bank

Morgan Stanley Bank

Northern Trust Company

Promontory Interfinancial Networks

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