



February 2, 2011

**TO:** The Executive Secretary's Section  
FDIC Legal Division

**FROM:** Diane Ellis  
Deputy Director  
Division of Insurance and Research

**SUBJECT:** Teleconference and meeting with the Midsize Bank Coalition of America and Midsize Bank Coalition of America Member Banks, 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 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.

The Mid Size Bank Coalition of America (MBCA) requested a meeting with the FDIC to discuss in detail issues raised in the comment letter submitted by the MBCA. The initial meeting was held via teleconference on January 26, 2011 with a follow-on meeting held at the FDIC's offices on February 2, 2011.

The discussion during both the call and the meeting centered around the issues raised by the MBCA in its comment letter dated January 3, 2011, with a specific emphasis on the definition of leveraged loans.

January 26, 2011 Teleconference  
FDIC Staff and MBCA Representatives

**Name**

Russell Goldsmith  
Jim Smith  
Terri Messina  
Harry McAdams  
Bill Perotti  
Abby Wendel  
Doug Hiatt  
Dave Hostetter  
Jeff Knight  
Chris Wolking  
Andrew Shipe

**Representing**

City National Bank  
Webster Bank  
Webster Bank  
Frost/Cullen Bank  
Frost/Cullen Bank  
UMB Financial  
TCF Financial  
Fulton Financial  
Old National  
Old National  
Arnold & Porter

John Bruno	Locke Lord Bissell and Liddell LLP
Mark Siegel	Locke Lord Bissell and Liddell LLP
Marc Steckel	FDIC
Lisa Ryu	FDIC
Andy Felton	FDIC
Mike Anas	FDIC
Patrick Mitchell	FDIC
Matt Valentine	FDIC

February 2, 2011 Meeting  
 FDIC Staff and MBCA Representatives

<b><u>Name</u></b>	<b><u>Representing</u></b>
Russell Goldsmith	City National Bank
Doug Hiatt	TCF Financial Corp.
Bryan Jordan	First Horizon National Corp.
Andrew Shipe	Arnold & Porter LLP
John Bruno	Locke Lord Bissell and Liddell LLP
Diane Ellis	FDIC
Marc Steckel	FDIC
Lisa Ryu	FDIC
Andy Felton	FDIC
Patrick Mitchell	FDIC
Chris Bellotto	FDIC
Teleconference	
Brenda Bruno	FDIC
Kevin Bruno	FDIC
Matt Valentine	FDIC