October 6, 2011

TO: Executive Secretary

FROM: Phillip E. Sloan, Counsel

Legal Division

SUBJECT: Meeting with Fair Isaac Corporation Related to Section 941 of the Dodd-Frank

Wall Street Reform and Consumer Protection Act

Please include this memorandum in the public file on the Notice of Proposed Rulemaking relating to Credit Risk Retention (RIN 3064-AD74), 76 Fed. Reg. 24090 (the "NPR").

On October 6, 2011 FDIC staff (George Alexander and Phil Sloan) met with Joanne Gaskin, a representative of Fair Isaac Corporation, and Drew Cantor, a representative of Peck, Madigan, Jones & Stewart, Inc., to receive comments on the NPR.

The discussion focused on attributes of credit scores and whether credit scores should be used in the determination of whether a mortgage would qualify as a qualified residential mortgage.