

## **MEMORANDUM**

**TO:** Public File – Notice of Proposed Rulemaking: Tax Allocation Agreements (RIN 3064-AF62)

**FROM:** Andrew Overton, Senior Examination Specialist (Banking Accounting), Risk Management Supervision, FDIC

**DATE:** July 28, 2021

**SUBJECT:** Meeting with Representatives from Barclays Bank

On July 19, 2021, FDIC staff met with representatives from Barclays Bank PLC (Barclays), Wilmington, DE, to discuss the interagency Notice of Proposed Rulemaking (“NPR”) for tax allocation agreements that was published in the Federal Register on May 10, 2021 (86 FR 24755).

The primary topics covered in this meeting were the NPR’s proposed changes involving treatment of deferred tax assets arising from tax loss and tax credit carryforward and the bank’s suggestions for addressing potential regulatory capital and liquidity considerations that were covered in a comment letter provided in response to the NPR dated July 9, 2021.

### **Participants:**

Yakov Mirocznik, Barclays  
Brendan Reilly, Barclays  
Amanda Ryles, Barclays  
Alice Brent, FDIC  
Krystal Houde, FDIC  
Carol Liquori, FDIC  
Andrew Overton, FDIC  
Patricia Roderick, FDIC