Request for Information and Comment on Rules, Regulations, Guidance, and Statements of Policy Regarding Bank Merger Transactions (RIN: 3064–ZA31)

Meeting Requested by Representatives of the Bank Policy Institute (BPI) and Sullivan and Cromwell (S&C) With Staff of the Federal Deposit Insurance Corporation (FDIC)

On August 10, 2022, representatives of the Bank Policy Institute (BPI) and Sullivan and Cromwell (S&C) met with certain staff of the FDIC to discuss the contents of the May 31, 2022 joint <u>comment letter</u> submitted by BPI, Mid-Size Bank Coalition, and the Consumer Bankers Association in response to the FDIC's Request for Information and Comment (RIN: 3064-ZA31). BPI prepared presentation materials, which are attached to this meeting summary.

Topics addressed during the meeting include the following:

- Comments in response to the empirical analysis included in the FDIC Request for Information and Comment;
- Financial Stability Analytical Considerations;
- Role of the Consumer Financial Protection Bureau; and
- Single-Point-of-Entry/Total Loss-Absorbing Capacity for Non-Global Systemically Important Banks.

## **Meeting Attendees**

BPI and Sullivan & Cromwell (S&C)	FDIC
Lauren Anderson (BPI)	Jim Anderson (Legal)
Paul Calem (BPI)	Heather Basnett (RMS)
Rodgin Cohen (S&C)	Robb Connors (CISR)
Katie Collard (BPI)	Chris Finnegan (DCP)
John Court (BPI)	Mark Flanagan (Legal)
Francisco Covas (BPI)	Don Hamm (RMS)
Ana Gonzales (S&C)	Ashby Hilsman Legal)
Joseph Matelis (S&C)	Andrew Karp (Legal)
Bill Nelson (BPI)	Tom Lyons (RMS)
Paige Paridon (BPI)	James McGraw (CISR)
Matthew Rosenthal (BPI)	Andrew Meier (RMS)
Gregg Rozansky (BPI)	Jonathan Miller (DCP)
	Rae-Ann Miller (RMS)
	Tara Oxley (DCP)
	George Parkerson (RMS)
	Harrel Pettway (Legal)
	Ryan Rappa (Legal)
	Ryan Singer (DIR)
	George Small (RMS)
	David Wall (Legal)

## **FDIC Abbreviations:**

Division of Complex Institution Supervision and Resolution (CISR), Division of Depositor and Consumer Protection (DCP), Division of Insurance and Research (DIR), Legal Division (Legal), and Division of Risk Management Supervision (RMS).