January 18, 2007

MEMORANDUM TO: Public Comment File

FROM: James A. Marino
                                Project Manager
                                Division of Resolutions and Receiverships, FDIC

SUBJECT: Meeting with Branch Banking and Trust Company (BB&T)

On December 13, 2006 the FDIC published in the *Federal Register* the Large-Bank Deposit
Insurance Determination Modernization Proposal advance notice of proposed rulemaking
(ANPR). The FDIC is seeking comments on whether the largest insured depository institutions
should be required to modify their deposit systems so that the FDIC may calculate deposit
insurance coverage quickly.

FDIC staff met with BB&T representatives in Wilson, North Carolina on January 12, 2007 to
discuss the ANPR, particularly regarding the bank's deposit data structures. This meeting was
requested by the FDIC. BB&T participants included staff from IT Services and Deposit
Services. FDIC participants included Division of Resolutions and Receiverships staff who have
worked on various aspects of the ANPR, the FDIC's dedicated examiner and contractors
involved in developing the FDIC's new claims administration system.

The ANPR outlines a series of data elements necessary to conduct an insurance determination in
the event of failure. The FDIC would like to develop a standard data framework which does not
place an onerous burden on affected institutions, while ensuring that the FDIC is provided with
an optimum set of data structures within that framework that enable a timely and accurate
insurance determination process. While the ANPR suggests standard data elements, the FDIC is
interested in determining whether large institutions may maintain other data helpful to the
insurance determination process. The focus of this meeting was to gain a better understanding of
the deposit data structures of BB&T, as a representative large, insured depository institution.

The meeting started with a brief presentation by the FDIC on the background of the ANPR and
the new claims administration system. The remainder of the meeting consisted of detailed
discussions of BB&T's deposit data structures. BB&T staff shared informal views on the
ANPR.