

October 25, 2006

MEMORANDUM TO: Executive Secretary

FROM: Kymberly K. Copa
Senior Counsel, Legal Division, FDIC

SUBJECT: Meeting with Representatives of Several Institutions to
Discuss Risk-Based Assessments and Designated Reserve
Ratio Proposed Rule

Please include this memorandum in the public file on the Notice of Proposed Rulemaking (NPR) on Risk-Based Assessments and the NPR on the Designated Reserve Ratio.

On September 22, 2006, representatives of Countrywide Bank, Morgan Stanley and Discover Bank, Charles Schwab Bank, and ING Direct met with Martin J. Gruenberg, Vice Chairman of the FDIC, and FDIC staff, to discuss the aforementioned deposit insurance reform-related NPRs. These representatives reiterated the comments they had previously filed, which are available on the FDIC's website.