

October 26, 2009

**MEMORANDUM TO:** The Executive Secretary's Section  
FDIC Legal Division

**FROM:** Joseph A. DiNuzzo  
Counsel  
Legal Division

**SUBJECT:** Meeting with Promontory Interfinancial Network and  
American Bankers Association on Prepaid Assessment NPR

Please include this memorandum in the public file on the Proposed Rule on Prepaid Assessments, 74 Fed. Reg. 51063 (Oct. 2, 2009), ("Proposed Rule").

On October 22, 2009, FDIC staff met with representatives of Promontory Interfinancial Network, LLC ("Promontory") and the American Bankers Association ("ABA") to discuss aspects of the Proposed Rule concerning the transfer of prepaid assessments. Staff responded to preliminary questions about how the transfer of prepaid assessments would operate, if the FDIC finalized the Proposed Rule, and encouraged the Promontory and ABA representatives to file comments on this aspect of the Proposed Rule.