MEMORANDUM TO: The Executive Secretary's Section

FDIC Legal Division

FROM: Diane Ellis

**Deputy Director** 

Division of Insurance and Research

SUBJECT: Teleconference with American Bankers Association on

Large Bank Assessment System NPR

The FDIC published in the Federal Register a Notice of Proposed Rulemaking requesting comments on its proposal to amend the FDIC's assessment regulations and revise the assessment system applicable to large institutions to better differentiate institutions by taking a more forward-looking view of risk, to better take into account losses that the FDIC will incur if an institution fails, to revise the initial assessment rates for all institutions, and to make technical and other changes to the rules governing the risk-based system. 75 Fed. Reg. 23516 (May 3, 2010).

On Friday, April 20, 2010, FDIC staff participated in a teleconference sponsored by the American Bankers Association (ABA). FDIC staff provided an overview of the proposed rulemaking and answered a variety of questions from bankers and representatives from the ABA.