



February 2, 2011

TO: The Executive Secretary's Section
FDIC Legal Division

FROM: Diane Ellis
Deputy Director
Division of Insurance and Research

SUBJECT: Meeting with Financial Services Roundtable - Large Bank Pricing System RIN 3064-AD66, 75 FR 72612 (November 24, 2010).

The FDIC published in the Federal Register a Notice of Proposed Rulemaking (NPR) requesting comment on its proposal to revise the assessment system applicable to large insured depository institutions to better differentiate institutions and take a more forward-looking view of risk; to better take into account losses that the FDIC may incur if an institution fails; and to make technical and other changes to the rules governing the risk-based assessment system.

The Financial Services Roundtable (“the Roundtable”) requested a meeting with the FDIC to discuss the NPR and to address in detail an issue not raised in the comment letter submitted by the Roundtable on January 3, 2011. A teleconference was held on February 2, 2011, and a discussion was conducted with representatives of the Roundtable, its member banks, and FDIC staff.

The discussion generally concerned the definition of leveraged loans in the concentration ratio from the scorecard for large banks in the FDIC’s proposed large bank pricing system. The Roundtable indicated that some additional information might be forthcoming to the FDIC.

February 2, 2011 Meeting
FDIC Staff and Financial Services Roundtable Representatives

Name

Representing

Dan Morton
Dan Neumeyer
Brian Tate
Greg Lyons
Samuel E. Proctor

The Huntington National Bank
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