



February 2, 2011

TO: The Executive Secretary's Section
FDIC Legal Division

FROM: Diane Ellis
Deputy Director
Division of Insurance and Research

SUBJECT: Teleconference and meeting with the Midsize Bank Coalition of America and Midsize Bank Coalition of America Member Banks, 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 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 Mid Size Bank Coalition of America (MBCA) requested a meeting with the FDIC to discuss in detail issues raised in the comment letter submitted by the MBCA. The initial meeting was held via teleconference on January 26, 2011 with a follow-on meeting held at the FDIC's offices on February 2, 2011.

The discussion during both the call and the meeting centered around the issues raised by the MBCA in its comment letter dated January 3, 2011, with a specific emphasis on the definition of leveraged loans.

January 26, 2011 Teleconference
FDIC Staff and MBCA Representatives

Name

Russell Goldsmith
Jim Smith
Terri Messina
Harry McAdams
Bill Perotti
Abby Wendel
Doug Hiatt
Dave Hostetter
Jeff Knight
Chris Wolking
Andrew Shipe

Representing

City National Bank
Webster Bank
Webster Bank
Frost/Cullen Bank
Frost/Cullen Bank
UMB Financial
TCF Financial
Fulton Financial
Old National
Old National
Arnold & Porter

John Bruno	Locke Lord Bissell and Liddell LLP
Mark Siegel	Locke Lord Bissell and Liddell LLP
Marc Steckel	FDIC
Lisa Ryu	FDIC
Andy Felton	FDIC
Mike Anas	FDIC
Patrick Mitchell	FDIC
Matt Valentine	FDIC

February 2, 2011 Meeting
 FDIC Staff and MBCA Representatives

<u>Name</u>	<u>Representing</u>
Russell Goldsmith	City National Bank
Doug Hiatt	TCF Financial Corp.
Bryan Jordan	First Horizon National Corp.
Andrew Shipe	Arnold & Porter LLP
John Bruno	Locke Lord Bissell and Liddell LLP
Diane Ellis	FDIC
Marc Steckel	FDIC
Lisa Ryu	FDIC
Andy Felton	FDIC
Patrick Mitchell	FDIC
Chris Bellotto	FDIC
Teleconference	
Brenda Bruno	FDIC
Kevin Bruno	FDIC
Matt Valentine	FDIC