



September 14, 2011

TO: The Executive Secretary's Section
FDIC Legal Division

FROM: Sheikha Kapoor
Counsel

SUBJECT: Meeting with American Bankers Association (ABA) and Certain ABA Member Banks on September 12, 2011; Follow-Up Meeting on September 19, 2011 - Proposed Agency Information Collection Activities; Comment Request 76 Fed. Reg. 44987 (July 27, 2011); Comment period closes September 26, 2011.

On July 27, 2011, the FDIC, OCC, Federal Reserve Board, and OTS published in the Federal Register a Joint Notice requesting comment on their Proposed Agency Information Collection Activities (i.e., proposed changes to the Consolidated Report of Condition and Income (Call Report), Thrift Financial Report, Report of Assets and Liabilities of U.S. Branches and Agencies of Foreign Banks, and Report of Assets and Liabilities of a Non-U.S. Branch that is Managed or Controlled by a U.S. Branch or Agency of a Foreign (Non-U.S.) Bank). The proposed changes to these reports relate to changes made earlier this year to the assessment base used for deposit insurance premiums and the risk-based assessment system for large insured depository institutions.

On June 17, 2011, OMB approved the agencies' emergency clearance requests to implement these assessment-related reporting revisions. Because the assessment-related reporting revisions will need to remain in effect beyond the limited approval period associated with an emergency clearance request, the agencies, under the authority of the Federal Financial Institutions Examination Council, are requesting public comment on a proposal to extend, with revision, the collections of information related to assessments.

The ABA requested a meeting with the FDIC to discuss the notice and to address in detail concerns as to the definitions of and the availability of information for the proposed reporting required of large institutions on subprime and leveraged loans in connection with the assessments-related rulemaking finalized in February 2011. A meeting was held on September 12, 2011, and a discussion was conducted with representatives of the ABA, several of its member banks, and FDIC staff. (Additional member banks and FDIC staff participated by telephone.) On September 19, 2011, a follow-up meeting on the same subject was held with a subgroup of the participants at the September 12, 2011 meeting.

September 12, 2011 Meeting
ABA Representatives Attending in Person (as identified by the ABA)

Name

Representing

James Chessen	ABA
Kathleen McTighe	ABA
Robert Strand	ABA
Elizabeth Buie	Bank of America
Lynn Baldwin	Bank of America
Hernan Sabio	BB&T
Ram Narayan	Capitol One Financial Corporation
Joanne Aron	Citigroup Global Markets, Inc.
Eileen Casson	Citigroup Inc.
Susan Chapman	Citigroup Inc.
Blair Osborn	Comerica Bank
Jeffrey Herbert	Deutsche Bank
Ray Messina	Discover Financial Services
Daniel Neumeyer	Huntington National Bank
Ann-Margaret Sumnar	Huntington National Bank
Donald Benson	JPMorgan Chase Investment Bank
Doug Smith	JPMorgan Chase & Co.
Richard Thevenet	M&T Bank
Thomas Colosimo	Sterling Savings Bank
McHenry Kane	SunTrust Banks, Inc.
Mark Cvrkel	Susquehanna Bank
JamesGertie	TD Bank NA
Tim J. Beers	U.S. Bank
Craig Gifford	U.S. Bank
Anthony Kelley	U.S. Bank
Heather Brodbeck	Zions Bancorporation
Bernard Mason	The Risk Management Association
James Nelson	The Risk Management Association
Eli Peterson	The Clearinghouse Association, Inc.
Sam Proctor	Financial Services Roundtable
Brian Tate	Financial Services Roundtable

September 12, 2011 Meeting
FDIC Representatives Attending in Person

Art Murton	FDIC
Diane Ellis	FDIC
Marc Steckel	FDIC
Patrick Mitchell	FDIC
Jason Cave	FDIC
Matthew Green	FDIC
Christopher Bellotto	FDIC
Sheikha Kapoor	FDIC