June 27, 2011

TO: The Executive Secretary's Section FDIC Legal Division

FROM: Sheikha Kapoor Counsel

SUBJECT: <u>Meeting with the Mid-Size Bank Coalition of America</u> - Assessment Rate Adjustment Guidelines for Large and Highly Complex Institutions, 76 Fed. Reg. 21256 (April 15, 2011)

The FDIC published in the Federal Register a Notice requesting comment on Proposed Assessment Rate Adjustment Guidelines for Large and Highly Complex Institutions. The proposed guidelines would be used to determine how adjustments could be made to the total scores that are used in calculating the deposit insurance assessment rates of large and highly complex insured institutions. Total scores are determined according to the final rule on Assessments and Large Bank Pricing approved by the FDIC Board on February 7, 2011.

The Mid-Size Bank Coalition of America (MBCA) requested a meeting with the FDIC to discuss the proposed guidelines and to address in detail concerns raised in the comment letter submitted by the MBCA. The meeting was held via teleconference on June 23, 2011.

The discussion during the call centered around the issues raised by the MBCA in its comment letter dated May 26, 2011.

June 23, 2011 Meeting FDIC Staff and MBCA Representatives

<u>Name</u>

Mike Cahill Brent Tjarks Richad Shier Vince Hruska Hernan Hernandez Bob Jones Chris Wolking Jeff Knight Chester Wood Terry Bichsel Susan Stanley

Representing

City National Bank Old National Bank Old National Bank Old National Bank Trustmark Bank First Merit Corporation People's United Corey Hoze Harry McAdams Bill Perotti Andy Shipe Dave Stautz Doug Hiatt Darlene Chiu Bryan Sheila Smith Marc Steckel Kevin Bruno

Tyler Davis Matt Valentine Pat Mitchell Andy Felton Sheikha Kapoor Banc-Corp Frost Bank Frost Bank Arnold & Porter TCF Bank TCF Bank East West Bank Commerce Bank

FDIC FDIC FDIC FDIC FDIC FDIC FDIC