

MEMORANDUM

TO: Public File – Notice of Proposed Rulemaking: Incentive-Based Compensation Arrangements

FROM: Catherine Topping, Counsel, FDIC Legal Division

DATE: April 23, 2014

SUBJECT: Meeting with Public Citizen and AFSCME

On April 23, 2014, FDIC staff met with representatives from Public Citizen and the American Federation of State, County, and Municipal Employees (AFSCME) to discuss the FDIC's proposed rule (NPR) to implement section 956 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. In that meeting, representatives from those organizations noted their concerns that a final rule had not yet been adopted. They also reiterated the points in the comments previously submitted on the NPR on behalf of their organizations. They generally commented on the importance of Section 956.

Participants:

Bartlett Naylor, Public Citizen

John Keenan, AFSCME

Rae Ann Miller, FDIC

Karen Currie, FDIC

Ruth Amberg, FDIC

Catherine Topping, FDIC

Nefretete Smith, FDIC