

MEMORANDUM

TO: Public File – Notice of Proposed Rulemaking: Market Risk; Alternatives to Credit Ratings for Debt and Securitization Positions (RIN 3064-AD70)

FROM: FDIC Staff

DATE: March 21, 2012

SUBJECT: Meeting with Ford Motor Credit

On March 21, 2012, representatives of the FDIC participated in a meeting with representatives of Ford Motor Credit (“Ford”) to discuss the potential impact of the Notice of Proposed Rulemaking (NPR) on the market risk capital requirements for debt and securitization positions, particularly with respect to the application of the proposed Simplified Supervisory Formula Approach to securitization positions. A list of attendees appears below.

FDIC:
Bobby Bean, Karl Reitz, Ryan Billingsley, Mark Handzlik & Michael Phillips

Ford:
Shelly Griffith, Scott Krohn & J.T. Young