

MEMORANDUM

TO: Public File – Notices of Proposed Rulemaking:

Regulatory Capital Rules: Regulatory Capital, Implementation of Basel III, Minimum Regulatory Capital Ratios, Capital Adequacy, Transition Provisions, and Prompt Corrective Action (12 CFR Parts 324, 325, and 362, RIN 3064-AD95) (“Basel III NPR”)

Regulatory Capital Rules: Standardized Approach for Risk-Weighted Assets; Market Discipline and Disclosure Requirements (12 CFR Part 324, and RIN 3064-AD96) (“Standardized Approach NPR”)

Regulatory Capital Rules: Advanced Approaches Risk-Based Capital Rule; Market Risk Capital Rule (12 CFR Parts 324 and 325, and RIN 3064 – AD97) (“Advanced Approaches NPR”)

FROM: FDIC Staff

DATE: November 28, 2012

SUBJECT: FDIC Meeting with Representatives from The Clearing House Association L.L.C. (“The Cleaning House”) on November 28, 2012, on the Basel III, Standardized Approach, and Advanced Approaches NPRs

On November 28, 2012, FDIC staff met with representatives of The Clearing House regarding its responses to the Basel III, Standardized Approach, and Advanced Approaches NPRs, which were published in the Federal Register of August 30, 2012 (77 Fed. Reg. 52792 52888, and 52978, respectively). The Clearing House representatives provided an overview of its comment letter on the Basel III, Standardized Approach, and Advanced Approaches NPRs, which was dated October 22, 2012.

Among the topics covered were: (i) the Basel III NPR’s regulatory capital treatment of accumulated other comprehensive income (“AOCI”); (ii) the Standardized Approach NPR’s risk weights for certain categories of residential mortgages; and (iii) The Clearing House’s position that certain requirements in the NPRs were inconsistent with the Basel III capital standards that were adopted internationally.

The FDIC representatives at this meeting were:

- Bobby Bean – Capital Markets/RMS
- Ryan Billingsley – Capital Markets/RMS
- Suzanne Clair – Capital Markets/RMS
- David Riley – Capital Markets/RMS
- Michael Phillips -- Legal
- Mark Handzlik -- Legal
- Christine Bouvier – Office of the Chief Accountant

The Clearing House representatives at the meeting were:

- Debbie Toennies – J.P. Morgan Chase
- Bill McNairy – Bank of America Corporation
- Kieran Fallon – PNC
- Eli Peterson – BNY Mellon
- Hunter Bennett – BB&T
- Jeff O'Keefe – Wells Fargo Corporation
- Marc Weinberg – Citigroup
- Stephen Randall – Citigroup
- Scott Stengel – American Securitization Forum
- David Wagner – The Clearing House
- Michelle Hubertus – The Clearing House
- Rodney Abele – The Clearing House
- Jim Herzog – Comerica (phone)