

Title: Deposit Insurance Regulations: Definition of Insured Deposit

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Comment: While limiting the exposure to the DIF, the proposed rule increases international public relations exposure for the USA. As an alternative, cover US Dollar deposits in foreign branches of USA banks up to the current domestic limits. This could be phased in over five years with a concurrent deposit insurance fee increase for those institutions involved. The fee to USA banks with foreign branch deposits should be double the current domestic fees for insurance until a sufficient and substantial increase in the DIF is achieved. In this manner, the USA banks without foreign branches would not be subsidizing large banks with foreign branches.

The details can and should be worked out, as the USA must be the bastion of financial stability for upcoming crises.

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