

## MEMORANDUM

**TO:** Public File - Notice of Public Rulemaking: Liquidity Coverage Ratio: Liquidity Risk Measurement, Standards, and Monitoring, (RIN 3064-AE04) (“Liquidity Coverage Ratio NPR”)

**FROM:** Sue Dawley, Senior Attorney, Legal Division

**DATE:** April 22, 2014

**SUBJECT:** Meeting with Representatives from the Mortgage Bankers Association (the “MBA”)

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On April 9, 2014, FDIC staff, together with staff of the Board of Governors of the Federal Reserve System and the Office of the Comptroller of the Currency, met with representatives of the MBA.

The representatives of the MBA presented their concerns and views with regard to certain provisions of the Liquidity Coverage Ratio NPR, which was issued in the Federal Register of November 29, 2013 (78 FR 71818), including (1) the 100 percent outflow rate for special purpose entities, (2) treatment of unfunded commercial real estate commitments, (3) operational deposits, and (4) the treatment of real estate investment trusts.

The FDIC representatives at this meeting were:

- Kyle Hadley, Section Chief for Examination Support, Capital Markets/RMS
- Eric Schatten, Policy Analyst, Capital Markets/RMS
- Greg Feder, Counsel, Legal Division
- Sue Dawley, Senior Attorney, Legal Division

The MBA’s representatives in attendance at this meeting were:

- George Green, Associate Vice President, Commercial/Multifamily
- Gail Cardwell, Senior Vice President, Commercial/Multifamily Policy and Member Services
- James Gross, Vice President of Financial Accounting and Public Policy
- Louis P. Mathews, Senior Vice President, M & T Bank
- Anthony Bulic, Senior Vice President & Senior CRE Portfolio Manager, KeyBank