

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 CRE Financial Council, PNC Financial Services Group, and the National Multifamily Housing Council (“Commercial and Multifamily Real Estate Finance Groups”)

On February 25, 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 Commercial and Multifamily Real Estate Finance Groups.

The representatives from the Commercial and Multifamily Real Estate Finance Groups 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 treatment of securitization outflows and (2) the treatment of commercial real estate related facilities.

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 (by telephone)
- Sue Dawley, Senior Attorney, Legal Division (by telephone)

The Commercial and Multifamily Real Estate Finance Groups’ representatives in attendance at this meeting were:

- Christina Zausner, Vice President, Industry and Policy Analysis, CRE Finance Council
- David Cardwell, Vice President, Capital Markets, National Multifamily Housing Council
- William G. Lashbrook III, Senior Vice President for Real Estate, PNC Financial Services Group