

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: July 7, 2014

SUBJECT: Meeting with Representative from Novantas, Inc.

On June 19, 2014, FDIC staff met with Steve Turner, of Novantas. Novantas is a financial services consulting and solutions firm headquartered in New York that advises large North American banking institutions, among others.

The representative from Novantas presented 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 effect of increased competition for relationship deposits on community banks, (2) operational deposit balances and flows, (3) Federal Home Loan Bank lending capacity, (4) brokered and non-traditional deposits, and (5) collateralized municipal deposits.

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

Novantas was represented at this meeting by:

- Steven H. Turner, Managing Director