



July 30, 2019

**TO:** Executive Secretary

**FROM:** Celia Van Gorder  
Supervisory Counsel, Legal Division, Complex Financial Institutions Section

**SUBJECT:** Meeting at the Request of the Bank Policy Institute, American Bankers Association and Securities Industry and Financial Markets Association to Discuss the Notice of Proposed Rulemaking Regarding Resolution Plan Rule

On July 19, 2019, staff from the Federal Deposit Insurance Corporation (“FDIC”), Board of Governors of the Federal Reserve System (“FRB”), and the Federal Reserve Bank of New York (“New York Fed”) (each of the FDIC, FRB, and New York Fed, an “agency”) participated in a phone call with staff of and counsel to the Bank Policy Institute (“BPI”), American Bankers Association (“ABA”), Securities Industry and Financial Markets Association (“SIFMA” and collectively with BPI and ABA, the “associations”), and representatives from multiple financial firms to discuss the Notice of Proposed Rulemaking published in the Federal Register (*Resolution Plans Required*, 84 Fed. Reg. 21600 (May 14, 2019)) (“proposal”) regarding the resolution plan rule (12 C.F.R. Part 381, 12 C.F.R. Part 243), and the letters the associations submitted on May 1, 2019 and June 21, 2019 concerning the proposal.

Representatives of the associations stated that generally they are supportive of the proposal, and added that they are hopeful it will be finalized quickly. Representatives of the associations and certain of the financial firms also noted certain issues described in the associations’ May 1, 2019 and June 21, 2019 letters commenting on the proposal. In particular, these individuals stressed the importance to plan filers of having certainty about plan contents no less than one year prior to the plan submission date. Agency staff acknowledged the statements expressed.

A list of participants appears below:

FDIC	Alexandra Barrage, Dena Kessler, Lori Quigley, Celia Van Gorder, David Wall
FRB	Katie Ballintine, Steve Bowne, Catherine Tilford, Tudor Rus, Jay Schwarz
New York Fed	Kristin Malcarney
BPI, ABA, SIFMA, financial firms	Please see attached

## 165(d) Teleconference Attendees

### Bank Representatives:

Lawrence Nesbit, Huntington  
Paul Jaremski, VP, Resolution & Recovery Planning, Huntington  
Eric Thompson, VP & Counsel, State Street  
Matthew Tropp, Managing Director, Legal Department, Goldman Sachs  
Ethan Arrow, Goldman Sachs  
Jeffrey Conover, SVP, Capital and Resolution Planning, Northern Trust  
Robert Krebs, Ass't General Counsel, Northern Trust  
Lori Brunell, Senior Enterprise Risk Director, Ally  
Ana Volpi, SVP, Director, Finance Strategic Delivery Office, Citizens  
Dennis Smith, Citizens  
Andrew Kales, TD  
Paul Antonellis, TD  
Sharon Hamilton, SVP, CCAR Director, BBVA  
Adina Brownstein, Managing Director, Americas Recovery and Resolution Planning, Barclays  
Kara Barry, Barclays  
Janet Farrow, UBS  
Timothy Roberti, UBS  
Daryl DiFazio, UBS  
Erin Johnston, SVP, Global Recovery and Resolution Planning, Bank of America  
Adam Shearer, Global Recovery and Resolution Executive, Bank of America  
Priya Bindra, Morgan Stanley  
Richard Bean, Wells Fargo  
Tim Becker, Head of Enterprise Finance Public Policy, Wells Fargo  
Jennifer Knox, Wells Fargo  
Jarryd Anderson, Wells Fargo  
Kieran Fallon, PNC  
Jason Fincke, Ass't General Counsel, Legal Regulatory Group, U.S. Bank  
Karla Menzel, U.S. Bank  
Drew DiVall, U.S. Bank  
Kayla J. Crews, Head of RRP, Regions  
Coby Kutcher, Senior Analyst, Regions  
Elizabeth Taylor, SVP & Assistant General Counsel, Head of Regulatory Policy, Regions  
Gideon Hart, Senior Counsel, KeyBank  
Michael Coffee, VP, Senior Legal Counsel, HSBC  
Joan DaPonte, Assistant General Counsel, MUFG  
Irene Dlugopolsky, Resolution Planning, MUFG  
Anne Hwang, Resolution Planning, MUFG  
John Dare, Managing Director, JP Morgan  
Robert Kidd, Capital One  
Krish Subramanian, Capital One  
Jeff Wool, Associate General Counsel, Head of Recovery and Resolution Planning Legal, Citi

**Trade Staff & Counsel:**

John Court, General Counsel, BPI

Annie Rebbe, AVP, BPI

Hu Benton, VP, Banking Policy, ABA

Carter McDowell, Managing Director, Associate General Counsel, SIFMA

Meg Tahyar, Partner, Davis Polk

Daniel Newman, Counsel, Davis Polk

Kirill Lebedev, Associate, Davis Polk

Sumeet Sanjeev Shroff, Associate, Davis Polk

Kate Somers, Summer Associate, Davis Polk

Larenz Devaren, Summer Associate, Davis Polk

Ben Weiner, Partner, Sullivan & Cromwell