

MEMORANDUM

TO: Public File – Basel III (RIN 3064-AD95); Standardized Approach for Risk-Weighted Assets; Market Discipline and Disclosure Requirements (RIN 3064-AD96); Regulatory Capital Rules: Advanced Approaches Risk-based Capital Rules; Market Risk Capital Rule (RIN 3064-AD97)

FROM: FDIC Staff

DATE: May 21, 2013

SUBJECT: Meeting with the American Bankers Association and the Subchapter S Bank Association, Inc.

On May 21, 2013, representatives from the FDIC participated in a meeting with representatives from the American Bankers Association and Subchapter S Bank Association, Inc. The discussion during the meeting centered on the potential impact of the proposed Basel III capital rules on subchapter S depository institutions and holding companies.

FDIC: Ryan Billingsley, William Baxter, Benedetto Bosco, Suzanne Clair, Rachel Jones, Michael Phillips, and David Riley

Bankers:

- Lawson Jackson McConnell, Jr., President and CEO, Pinnacle Bank Elberton, GA
- Al Jones, Chairman and CEO, American Bank, NA Corpus Christi, TX
- John J. Madden, Chairman and CEO, First National Bank La Grange, IL
- Curtis Davidson, President and CEO, First National Bank and Trust Company Ardmore, OK
- Mark A. Long, President and CEO, First Commercial Bank, NA Seguin, TX

ABA:

- Beth Knickerbocker, Vice President and Senior Counsel, Office of Regulatory Policy
- Hugh Carney, Senior Counsel, Office of Regulatory Policy

Subchapter S Bank Association, Inc.:

- Patrick J. Kennedy, Jr. President; Kennedy Sutherland, LLP
- William D. Sutherland, Kennedy Sutherland, LLP