MEMORANDUM

TO: Public File – Notice of Proposed Rulemaking:

Regulatory Capital Rules: Regulatory Capital, Implementation of Basel III, Minimum Regulatory Capital Ratios, Capital Adequacy Transition Provisions, and Prompt Corrective Action (RIN 3064-AD95)

Regulatory Capital Rules: Standardized Approach for Risk-Weighted Assets; Market Discipline and Disclosure Requirements (RIN 3064-AD96)

FROM: Michael Phillips, Counsel, FDIC Legal Division

DATE: October 11, 2012

SUBJECT: Meeting with Representatives from the American Bankers Association Concerning Mutual Savings Banks' Issues on the Basel III Rulemaking

On October 5, 2012, representatives from the FDIC's Division of Risk Management Supervision, Capital Markets Branch (RMS/CM) and its Legal Division met with representatives from the American Bankers Association(ABA). This meeting involved feedback from the ABA representatives on the aforementioned notices of proposed rulemaking concerning Basel III capital requirements and the Standardized Approaches for risk-weighted assets. Many of the ABA representatives at the meeting currently are executives at mutual savings banks.

American Bankers Association

Thomas Barnes, ABA Membership
American Bankers Association

Hugh Carney, Senior Counsel II
American Bankers Association

Dawn Causey, General Counsel
American Bankers Association

Christy, Stephen F.
Chief Executive Officer
Mascoma Mutual Financial Services Corporation
67 North Park Street
Lebanon, NH

Robert Davis
Executive Vice President
American Bankers Association

Hermann, George W.
President
Windsor Federal MHC
250 Broad Street
Windsor, CT

Jenks, Stanley D
President and Chief Executive Officer
Security Bancorp MHC
220 East Broadway
Monmouth, IL 61462

Smith, Margaret R.(CPA)
President and Chief Executive Officer
First Federal Savings of Middletown
PO Box 2023, 22 James Street
Middletown, NY

FDIC

Michael B. Phillips
Counsel, Legal Division

David Riley
Senior Policy Analyst, RMS/CM