

MEMORANDUM

TO: Public File – Notice of Public Rulemaking:
Regulatory Capital Rules: Regulatory Capital, Enhanced Supplementary Leverage Ratio Standards for Certain Bank Holding Companies and Their Subsidiary Insured Depository Institutions (12 CFR Part 324, RIN 3064-AE01) (“Supplementary Leverage Capital NPR”)

FROM: FDIC Staff

DATE: September 10, 2013

SUBJECT: FDIC Meeting with Representatives from the American Bankers Association (“ABA”), The Clearing House Association, L.L.C. (“Clearing House”), the Securities Industry and Financial Markets Association (“SIFMA”), and Certain Banking and Securities Organizations

On September 10, 2013, FDIC staff met with representatives of the ABA, the Clearing House, SIFMA, and certain banking and securities organizations (collectively, the “ABA/Clearing House representatives”). This meeting involved the ABA/Clearing House representatives’ concerns regarding the Supplementary Leverage Capital NPR, which was issued in the Federal Register of August 20, 2013, with a comment period deadline of October 21, 2013.

The ABA/Clearing House representatives provided certain proposals involving the Basel Committee’s and the banking agencies’ consideration of (1) for securities financing transactions, the recognition of legally enforceable netting arrangements; (2) for general derivative exposures, a more accurate measurement methodology for the valuation of high quality collateral; and (3) for written credit derivatives, the recognition of offsetting hedges.

The FDIC representatives at this meeting were:

- Bobby Bean, Associate Director, Capital Markets/RMS;
- Karl Reitz, Chief, Capital Markets Strategies Section, Capital Markets/RMS;
- Ryan Billingsley, Chief, Capital Policy Section, Capital Markets/RMS;
- Michael Phillips, Counsel, Legal Division
- Mark Handzlik, Counsel, Legal Division

The ABA/Clearing House representatives at this meeting were:

Citigroup: Yingli Xie

JP Morgan Chase: Debbie Toennies

Bank of America: Daniel Seguine

Goldman Sachs: Charles Edwards

Morgan Stanley: Dan Park; Andrew Nash

State Street Corporation: Joe Barry; John Slyconish

Northern Trust: Kelly K Dibble

SIFMA: Carter McDowell

Covington & Burling: Keith Noreika

ABA: Hugh Carney; Alison Touhey