



Federal Deposit Insurance Corporation

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Legal Division

June 22, 2015

TO: Executive Secretary

FROM: Karen L. Main
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SUBJECT: Conference Call with Representatives of FIS to Discuss the Advance Notice of Proposed Rulemaking Regarding Large Bank Deposit Insurance Determination Modernization

Please include this memorandum in the public file on the Advance Notice of Proposed Rulemaking regarding Large Bank Deposit Insurance Determination Modernization (RIN 3064-AE33), 80 FR 23478.

On June 18, 2015, FDIC staff (Teresa Franks, Christopher Hencke, Shane Kiernan, Karen Main, Peter Miller, Jin Qian, and Marc Steckel) participated in a conference call with staff from FIS (Karla Jo Booe, Sheila Hensley, and John Hofelich).

The discussion raised a number of issues, including: the possible time frame for implementation of certain proposals, if ultimately adopted; the process for determining and placing provisional holds on depositors' accounts as well as the application of the subsequent debits and credits; possible administrative or financial relief for banks required to identify deposit accounts by FDIC deposit insurance category; identification of accounts as closing night deposits and post-closing night deposits; how frequently the FDIC amends its deposit insurance rules; the time frame within which a covered institution would have to be able to provide customer level deposit insurance determinations after bank failure; and data processing system requirements that may be necessary should certain proposals be adopted in the future as well as the current limitations of those systems.