



Federal Deposit Insurance Corporation

3501 N. Fairfax Drive, Arlington, VA 22226

Legal Division

July 2, 2015

TO: Executive Secretary

FROM: Shane Kiernan
Counsel, Legal Division

SUBJECT: Conference Call with the American Bankers Association and Others 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 (the "ANPR").

On June 25, 2015, FDIC staff (listed on Attachment A) participated in a conference call with representatives from the American Bankers Association and member organizations (invited participants listed on Attachment B).

The conference call followed up a previous conference call held on May 6, 2015. FDIC staff began the discussion by stating that the FDIC's goal in issuing the ANPR is to develop a more effective method for making deposit insurance determinations. The participants continued their dialog on numerous issues related to the following topics: amendment of the FDIC's deposit insurance rules; mechanics of the deposit insurance determination process, including the need for additional information to make a deposit insurance determination, the identification of accounts as closing-night deposits and post-closing night deposits, and the application of debits and credits after the deposit insurance determination is completed; the possible time frame for implementation of the proposal, if ultimately adopted; and whether exemptions under 12 C.F.R. § 360.9 might be available as part of a new process.

ATTACHMENT A
(FDIC Staff)

Becker, Martin
Campagna, Frank C.
Cooley, David
Davis, Cathy
Fain, Jerry M.
Franks, Teresa J.
Kapoor, Sheikha
Kiernan, Shane
Main, Karen L.
Miller, Peter
Nguyen, Loc
Qian, Jin
Steckel, Marc
Taylor, Randy K.
Troup, Calvin
Villareal, Victor
Wondwosen, Meron

ATTACHMENT B
(ABA Invitees)

FDIC Large Bank Deposit Insurance Determination Modernization

Ally Financial Inc.

Susan Green Deposit Operations Executive
James (Jim) Kreig
Michele Lieber Chief Public Policy Officer

American Express

Jeremy Dyme Vice President and Senior Counsel

Bank of America Corporation

Virginia Bonaro Executive Vice President and Head of Commercial and Consumer Operation
William (Bill) Bridy Financial Advisor and Head of Client Onboarding Services
Amina Kaal
Richard Knaub Associate General Counsel
Fred La Plante
Linda McLaughlin-Moore Senior Vice President, Business Executive – Operations, Global Wholesale Banking Technolog
Kenneth Miller Deputy General Counsel
Kenneth Morton Senior Vice President, Global Technology & Operations COO Central BCMR
Katherina Mumford Senior Vice President
Valerie Redmond
Jennifer (Jen) Smith Vice President, Global Network and Infrastructure Solutions
William Templeton Associate General Counsel, Senior Vice President and Attorney, Bank Regulatory
Barbara Watson Senior Vice President and Senior Technology Manager
Phillip (Phil) Wertz Assistant General Counsel
Sondra Williams Senior Vice President
Charles (Chuck) Wilson Technology Executive for Domestic Deposits
Adria Youngblood Assistant Vice President and Project Manager

Bank of New York Mellon

Edward Lydick
Eli Peterson
Jennifer Xi Managing Director & Senior Counsel, Office of Public Policy & Regulatory Affairs
Jiren (Jack) Xu

Bank of the West / BNP Paribas

Ashish Kapur Senior Vice President and CCAR Program Manager
Justin McKellar In-House Counsel
Mark Locatelli Risk Modeling, First Hawaiian Bank
Peter Philbrick Director
Jacob Sorensen Head of Information Management and Business Intelligence

Barclays Group US Inc.

Emma Bailey Head of Marketing, Communications and Citizenship
Larry Drexler General Counsel and Chief Privacy Officer
Walt Phifer Commercial Manager of Barclays Deposits

BB&T Corporation

Chris Bradley Senior Vice President and Deposit Services Operating Manager
Lauren Cunningham Deposit Systems
Priscilla DeLuca Assistant Vice President and Legal Risk Manager, BB&T Legal Department
Blair Diamond Regulatory Compliance Policy Consultant
Virginia (Gina) Dinkins Financial Control Manager, Deposit Services
Roger Lieber Senior Vice President and Trust Operations Manager
Bruce MacPherson Recovery and Resolution Planning
Tracy Mathews FM Treasury Analyst
Lisa McDougald Executive Vice President and Deputy General Counsel
Cindy Powell Assisant Corporate Controller
Brian Roberts Product and Systems Support Consultant, Deposit Systems Development
Shelley Trogdon Vice President and Financial Executive, Deposits and Partnership Investments
Theresa Watkins Recovery and Resolution Planning and Assurance Manager, Funds Management Group

BBVA Compass

David Breland Corporate Counsel, Legal Department
Chris Butler Senior Vice President and Director of Financial Reporting
Mike Carlson Senior Vice President and Associate General Counsel
Mike Holden

FDIC Large Bank Deposit Insurance Determination Modernization

BMO Harris

Denise Jordan	Senior Manager
Jill Just	U.S. Regulatory Reporting
Abas Kanu	Senior Counsel
Andrew Karp	Deputy General Counsel, Bank of Montreal
Lorraine Waller	Associate General Counsel and Managing Director, Legal, Corporate and Compliance Group

Capital One Financial Corporation

Sebastian Astrada	Director and Assistant General Counsel
Lisa Goodlick	Associate General Counsel
Robert Kidd	Senior Director, Associate General Counsel, Regulatory Advisory, Legal Department
Michael (Mike) Liuzza	Senior Vice President and Senior Director, Retail Bank Operations, Applications and Data Man
James (Jim) Neilson	
Ms. Anh Quach	Government Relations Specialist
John Rayburn	Associate General Counsel, Regulatory & Policy
Michael Turk	Senior Financial Analyst

Charles Schwab Bank

Angela Birmingham	Head of Bank Operations
John Gardner	Vice President, Finance
Rene Kim	Senior Vice President, Trading Services
Peter Morgan	Senior Vice President and General Counsel
Keith Ungles	Senior Corporate Counsel
Jay Wardwell	Associate General Counsel

Citigroup Inc.

Peter Bieszard	Director
Susan Chapman	Managing Director, Global Risk Management and Risk Operations Senior Group Manager
William De Pietto	Technology Director
Luis Franco	Vice President, U.S. Regulatory Reporting
Ed Handelman	Managing Director and Associate General Counsel
Joanne Kauffmann	Compliance Director
Rhonda Landau	
Lester Levine	Senior Vice President
Rachel Loeff	Vice President
Chris Lindsey	
Andrew McGrath	Analyst
Steve Micka	Director and Global Head of U.S. Financial and Regulatory Reporting
Sandeep Pati	Senior Vice President, Resolution Planning & Strategy, Financial Regulatory Reform
Gary Sheehan	Senior Vice President
Kimberly Sherrill	
Junko (June) Shimizu	Corporate Regulatory Reporting
Gary Sullivan	
Curtis Tao	Managing Director, Associate General Counsel, Bank Regulatory
Anthony Turiano	Managing Director
Monika Wuttke	Director, Risk Analysis and Strategic Projects

Citizens Financial Group, Inc.

Jim Arsenault	Senior Vice President, Resolution Planning
Brian Connolly	Strategy & Administration
Raymond (Ray) Dorado	Executive Vice President and Deputy General Counsel, Head of Enterprise Bank Regulatory
Joyce Fillmore	Senior Vice President
Kristen Germani	Business Analysis Manager
Irene Huntley	Vice President, Business Support
Mark Zingale	Senior Vice President and Senior Counsel

Comerica Inc.

DJ Culkar	Senior Vice President and General Counsel for Regulatory Affairs
-----------	--

Deutsche Bank

Ms. Berit Block	Director and Senior Counsel
Mildred (Millie) Brown	Vice President, Product Management (emerging regulations), Deutsche Bank Trust Company A
Peter Bruzzese	Head of Government and Regulatory Affairs
Jeffrey Herbert	Director and Senior Counsel
Alessandro Hillman	Vice President, Government and Regulatory Affairs

FDIC Large Bank Deposit Insurance Determination Modernization

Discover Financial Services

Patricia Bailin
Patrick Haggerty

E*TRADE

Doug Hollowell Vice President and General Counsel

Fifth Third Bancorporation

Steve McClain Vice President and Compliance Manager for Retail Deposits
Benjamin (Ben) Mendelsohn Vice President of Product Management (deposit products) -- **good coversation**

Goldman Sachs

Alexander (Alex) Clark Vice President
Tanya Dorhout Vice President
Tom Fahy Vice President, GS Bank Technology
Andrew Olson Managing Director, Private Wealth Management Technology
Kelly Vendetti Vice President

H&R Block Bank, Kansas City, MO

Alana Neale Chief Financial Officer

HSBC NA

Anne Davenport Vice President and Senior Counsel
Marissa Eliades Attorney
William Kuhn

Huntington Bancshares Inc.

David Hodapp Associate Counsel and Assistant Vice President
Tiffany Swain Vice President and Senior Counsel

JPMorgan Chase & Co.

Greg Baer Managing Director and Head of Regulatory Policy
Mary Binder Vice President and Assistant General Counsel
Sarah Bosse Assistant Vice President and Senior Counsel
Jeanine Caliendo
Mark Colucy Senior Vice President
Satyaki Ghosh Dastidar VP and Senior Segment Risk Manager at Huntington National Bank
Matthew Diffley Vice President, Regulatory Reporting
David Dymkowski Vice President and Assistant General Manager, Contracts Management
Massimo Guglielmetti Executive Director, Corporate Financial Reporting
Ashley Harris Executive Director
Kathleen Juhase Senior Vice President and Associate General Counsel
Phil Lewis Global Head of Technology and Operations
Kathy McCulloch Vice President and Assistant General Counsel (Global Financial Crimes Legal)
John Quirk Managing Director
Traci Riege Executive Director
Andres Romero
Todd Schmitter Executive Director (Minneapolis, MN)
Emma Waddell AML Executive, Consumer Banking & Chase Wealth Management

KeyCorp

Richard (Dick) Kopek General Counsel
Scott Miller Financial Risk Governance Analyst
Jeffrey Smoltz Senior Treasury Analyst

Manufacturers and Traders Trust Company

Marianne Roche

Morgan Stanley

Andy Baer Global Head of Bank Regulation
Su Sun Bai Executive Director
John Baldino Vice President, Regulatory Change Management Officer
Priya Bindra Vice President
Davide Brocato Managing Director and Head of Bank Deposit Products
Albert (Al) Cooley Vice President
Jillian Eng Executive Director, Legal and Compliance Division
Jennifer Greca Executive Director and Counsel
Andrew Nash Vice President
Adeesh Setya Managing Director

FDIC Large Bank Deposit Insurance Determination Modernization

MUFG Union Bank

Allan DelosSantos	Head of Liquidity Risk Management
Mark Gillett	Managing Director and Associate General Counsel
Charity Lee	Vice President, Regulatory Reporting Analyst, Controller's Department
Riley Long	Vice President and Liability and Liquidity Strategist
David McCambridge	Regulatory Reporting QA Manager
Cassie Seay	Consultant
John Trohan	Treasurer
Maureen Young	Senior Regulatory Counsel

PNC Financial Services Group, Inc.

Rodney Abele	Senior Counsel, Regulatory Policy
William Bullian	
Linda Comella	Finance Manager, LCR Finance Team
Kevin Dolan	Counsel
James (Jim) Edgar	Retail Technology - Risk Manager
Kieran Fallon	Chief Counsel for Regulatory Affairs
Carol Hughes	
James (Jim) Keller	Chief Regulatory Counsel
Dominic Labitzky	Senior Counsel, Regulatory Affairs
Andrew Miller	Senior Vice President and Director of Regulatory Policy
Lisa Pickerell	
Madeleine Thomey	Vice President, Retail Balance Sheet & Capital Management
Becky Wing	Technology Manager

Popular, Inc.

Brian Doran	Region Executive and Director of Governmental Affairs, Popular Community Bank
Miguel Rodriguez Fonseca	Controlador de Trafico
María De Lourdes Jiménez	Senior Vice President and Corporate Compliance Division Head Manager
Lori Ann Lastra	Portfolio Manager
Ana Pagan Ortiz	Financial and Operational Risk Division Manager
Javier Vargas Perez	
Lisette Ponce	Financial Analyst
Camille Burckhart Portela	Chief Information Officer
Edwin Padilla Rios	
Javier Perez Rucabado	Vice President and Manager
Gustavo Moraza Santiago	

Regions Financial Corporation

Taylor Fendley	Liquidity Regulations Manager
Hope Mehlman	Senior Vice President and Assistant General Counsel
Nicholas (Nick) Podsiadly	Senior Vice President for Regulatory Policy
Stan Williams	Vice President and Senior Analyst
Kimberly (Kim) Wilson	Corporate Treasury

Sallie Mae Bank

Angela (Angie) Knoll	Director, Bank Control and Compliance
Dave Kronenberg	Manager, Bank Operations and Special Projects
Christi Henslee Palmer	Chief Financial Officer
Paul Schneider	Assistant Controller
William (Bill) Shields	Deputy Chief Compliance Officer

Santander Holdings USA, Inc.

Michael Campbell	Deputy General Counsel
Richard (Dick) Montemerlo	Director IT Security & Risk
Timothy (Tim) Sweeney	Government Affairs and Public Policy Manager
Jesse Villarreal	Executive Vice President and Director of Government Affairs and Public Policy
Paul Waters	Operations & Service Delivery / Deposit Account Services

FDIC Large Bank Deposit Insurance Determination Modernization

State Street Corporation

Mitchel Appelbaum	Senior Vice President and Senior Credit Counsel
Joseph (Joe) Barry	Senior Vice President, Regulatory and Industry Affairs
Kevin Courtney	Managing Counsel
Robert (Rob) McKeon	Vice President, Regulatory and Industry Affairs
Simon Zornoza	Senior Vice President and Senior Regulatory Counsel, Corporate Legal

SunTrust Banks, Inc.

McHenry Kane	First Vice President and AML Strategies Manager
Patricia O'Toole	Senior Vice President and Director, Enterprise Recovery & Resolution Planning
Lisa Scheid	First Vice President and Senior Counsel
Toni Stanek	First Vice President, Treasury Regulatory Relations
Martha Suggs	Senior Vice President

Synchrony Financial

James Madias	Finance and Treasury Internal Audit
Grace Wang	Model Risk Lead, Internal Audit

TCF Financial Corporation

Susan (Sue) Bode	Senior Vice President and Chief Accounting Officer
Brian Hurd	Executive Vice President and Assistant General Counsel
Marcia O'Brien	Financial Analyst III, Portfolio Sales and Acquisitions
Timothy (Tim) Wegmann	→ Corporate Controller

TD NA

Kent Andrews	Senior Vice President, Regulatory Risk and Risk Capital
Justin Benford	
Matthew (Matt) Eli	
Richard Grossi	Vice President and Senior Counsel
Andrew Kales	Vice President and Senior Counsel
Andrea Kenyon	Senior Vice President and Managing Counsel, Regulatory and Corporate Affairs
Ellen Reilly Patterson	Executive Vice President, Head of Legal, Compliance, AML, and General Counsel
Elizabeth (Beth) Randall	Banking Professional
Kaycee Shoemaker	Financial Analyst

U.S. Bancorp

John Axelson	Corporate Treasury Operations
Jeffrey Bloch	Vice President and Deputy Director
Bob Bradley	Enterprise Risk Services
Michael Cook	
Patrick (Pat) Coughlin	
Janice Decker	
Michael Dubois	General Counsel, Global Corporate Trust Services
Jason Fincke	Senior Corporate Counsel, Legal Regulatory Group
Andrew Gibbs	Vice President and Regulatory Compliance Manager
Robert Griner	Vice President, Federal Government Relations & Corporate Counsel
Debra (Deb) Wilmsmeyer	
Luke Wippler	Senior Vice President for Capital & Liquidity
Kevin Willen	Senior Vice President & Managing Director, Regulatory Affairs & Regulatory Services

UBS Financial Services Inc.

Jeffrey (Jeff) Alexander	Deputy General Counsel
Guy Francesconi	General Counsel
Darren McSpedon	Executive Director and Senior Associate General Counsel
Richard Mumford	Bank General Counsel and Regulatory Attorney

USAA

Danielle Reyes	Executive Director and Bank Counsel
Sarah Severson	Executive Director and Attorney

Webster Bank

Thomas (Tom) Clark	Vice President, IT
Deborah Dowling	Vice President and IT Client Relationship Manager
Amy Jones	Vice President and Senior Compliance Risk Manager
Michele Kaplan	
Thomas (Tom) Woodbury	Lead IT Governance Analyst

FDIC Large Bank Deposit Insurance Determination Modernization

Wells Fargo & Company

Ken Bonneville	Assistant General Counsel
Erik Carcamo	Vice President, Product Management
Deanna Ernest	Paralegal
Yon Lee	Senior Vice President, Deposit Products Group
Matthew McGrory	Senior Counsel, Corporate Regulatory Section
Daniel (Dan) Meade	Senior Bank Regulatory Counsel
Thomas (Tom) Pomeroy	Manager, Regulatory Change Office
Shirley Raymond	
John Stoker	
Peter (Pete) Storrs	Accounting Manager, Regulatory Reporting
John W	
Matthew Wheeler	Fraud Investigations Manager
Bradley (Brad) Wilson	Financial Advisor

WEX Bank, Midvale, UT

Kirk Weiler	President and CEO
-------------	-------------------

Zions Bancorporation

Derek Loutensock	Vice President and Deposit and Treasury Operations Compliance Officer, Corporate Compliance
------------------	---

American Bankers Association

Hu Benton	Vice President, Banking Policy
Tim Keehan	Vice President and Senior Counsel
Cris Naser	Vice President and Senior Counsel
Phoebe Papageorgiou	Vice President, Trust Policy
Brittany Dengler	
Rob Strand	Senior Economist

Sullivan & Cromwell LLP

Andrew Gladin	Partner
William (Bill) Kroener	Counsel
Christopher Nenno	Associate
Andrea Tokheim	Special Counsel
Mark Welshimer	Partner

The Clearinghouse

James Aloeos	Assistant Vice President, Strategy and Operations
Jarryd Anderson	Vice President
John Court	Managing Director and Senior Associate General Counsel
Clark Peterson	Vice President
Paige Pidano	Managing Director and Associate General Counsel
David Wagner	

Consumer Bankers Association

David Pommerehn	Vice President & Senior Counsel
-----------------	---------------------------------