

MEMORANDUM

TO: Executive Secretary

RE: Final Rule; Limited Exception for a Capped Amount of Reciprocal Deposits from Treatment as Brokered Deposits

FROM: Vivek Khare, Counsel

DATE: February 14, 2019

SUBJECT: Meeting with Industry Representatives

On February 5, 2019, industry representatives met with staff from the Federal Deposit Insurance Corporation (FDIC) to discuss the meaning of a footnote in the FDIC's final rule titled "Limited Exception for a Capped Amount of Reciprocal Deposits from Treatment as Brokered Deposits." The final rule was published in the Federal Register on February 4, 2019. 84 Fed. Reg. 1346. A list of participants appears below.

FDIC: Travis Hill
Ruth Amberg
Rae Ann Miller
Ashby Hilsman
Vivek Khare

Industry Representatives: H. Rodgin Cohen (Sullivan & Cromwell)
Camille Orme (Sullivan & Cromwell)
Jack Murphy (Cleary Gottlieb Steen & Hamilton)
Mark Jacobsen (Promontory Financial Group)
Douglas Phillips (Promontory Financial Group)
Chris Cole (Independent Community Bankers of America)