April 22, 2019

TO: Executive Secretary

FROM: Karen L. Main, Counsel Legal Division

SUBJECT: Meeting with the American Bankers Association to Discuss the Notice of Proposed Rulemaking Regarding Recordkeeping for Timely Deposit Insurance Determination

On April 3, 2019, FDIC staff (Marc Steckel and Teresa J. Franks) attended a meeting with staff from the American Bankers Association ("ABA") (Robert Strand, Phoebe Papageorgiou, and Nessa Feddis) to discuss the Notice of Proposed Rulemaking ("NPR") which had been approved by the FDIC Board of Directors on March 29, 2019. There were many representatives from the insured depository institutions subject to the current part 370 regulation ("covered institutions") participating in the meeting by phone. FDIC staff from both the Division of Resolutions and Receiverships ("DRR") and the Legal Division also participated by phone. The additional FDIC participants are identified and listed on Attachment A.

FDIC staff began the meeting by summarizing the substantive revisions to part 370 described in the NPR. The ABA staff and representatives of the covered institutions had the opportunity to ask questions concerning various aspects of the NPR. FDIC staff noted the 30-day period to comment on the NPR would begin upon the publication of the NPR in the *Federal Register*.

Attachment A

<u>DRR</u>

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