MEMORANDUM

TO: Executive Secretary

RE: Advance Notice of Proposed Rulemaking:

Brokered Deposits and Interest Rate Restrictions (RIN 3064-AE94)

FROM: Vivek V. Khare, Counsel, FDIC Legal Division

DATE: January 22, 2019

SUBJECT: Meeting with Representatives from Kasasa

On January 22, 2019, staff from the Federal Deposit Insurance Corporation (FDIC) met with representatives from Kasasa in response to the FDIC's Advance Notice of Proposed Rulemaking (ANPR) relating to brokered deposits and the interest rate restrictions. The ANPR was published in the Federal Register on February 6, 2019 (84 FR 2366). The Kasasa representatives shared their views on the FDIC's regulatory approach to brokered deposits.

A list of participants appears below.

FDIC: Ruth Amberg

Rae Ann Miller Sheikha Kapoor Tom Lyons Tom Hearn Vivek Khare

Kasasa: Gabriel Krajicek

Patrick Laughlin Kevin Eastman

Oliver Ireland (Morrison & Foerster LLP)