

MEMORANDUM

TO: Executive Secretary
Advance Notice of Proposed Rulemaking:
Brokered Deposits and Interest Rate Restrictions (RIN 3064-AE94)

FROM: Vivek Khare, Counsel

DATE: September 26, 2019

SUBJECT: Conversation with Representatives from HealthEquity

On September 26, 2019, representatives from HealthEquity had a phone conversation with the Federal Deposit Insurance Corporation (FDIC) in response to the FDIC's Advance Notice of Proposed Rulemaking (ANPR) relating to brokered deposits and the interest rate restrictions. Representatives discussed issues raised in their comment letter related to the FDIC's regulatory approach to brokered deposits and health savings accounts. The ANPR was published in the Federal Register on February 6, 2019 (84 FR 2366).

A list of participants appears below.

FDIC:	Chad Davis
HealthEquity:	Bill West Drew Cantor (Peck Madigan Jones)