



January 19, 2011

TO: The Executive Secretary's Section
FDIC Legal Division

FROM: Diane Ellis
Deputy Director
Division of Insurance and Research

SUBJECT: Meeting with The Clearing House and Clearing House Member Banks JPMorganChase, Wells Fargo, Citibank, Capital One and Bank of America - Large Bank Pricing System RIN 3064-AD66, 75 FR 72612 (November 24, 2010).

The FDIC published in the Federal Register a Notice of Proposed Rulemaking (NPR) requesting comment on its proposal to revise the assessment system applicable to large insured depository institutions to better differentiate institutions and take a more forward-looking view of risk; to better take into account losses that the FDIC may incur if an institution fails; and to make technical and other changes to the rules governing the risk-based assessment system.

The Clearing House requested a meeting with the FDIC to discuss the NPR and to address in detail issues raised in the comment letter submitted by The Clearing House on January 3, 2011. The meeting was held on January 13, 2011, with some representatives attending in person and others by telephone. A discussion was conducted with representatives of the Clearing House, its member banks, and FDIC staff.

The discussion generally concerned the statutory framework for the FDIC's proposed large bank pricing system, as well as various components of the proposed system and how those components address the risk large banks present to the Deposit Insurance Fund. The Clearing House indicated that some additional information might be forthcoming to the FDIC.

January 13, 2011 Meeting
FDIC Staff and Institution Representatives

Name

Paul Saltzman
Eli Peterson
Joe Alexander
William Kroener
H. Rodgin Cohen
Janine Guido

Representing

The Clearing House
The Clearing House
The Clearing House
Sullivan and Cromwell
Sullivan and Cromwell
Sullivan and Cromwell

Diane Ellis	FDIC
Steve Hanas	FDIC
Roberta McInerney	FDIC
Kymerly Copa	FDIC
Jason Fincke	FDIC
Chris Bellotto	FDIC

The Clearinghouse member banks (via telephone)

Greg Baer	JPMorganChase
Greg Meredith	JPMorganChase
Michael Araten	JPMorganChase
Sharon Fiolek	JPMorganChase
Peter Stoors	Wells Fargo
George Barnwell	Wells Fargo
Carl Howard	Citibank
Zion Shohet	Citibank
Candace Davis	Capital One
Phillip Wertz	Bank of America