

To: Public Comment File – Docket No. OCC–2023–0008

From: Carl Kaminski, Assistant Director, Bank Advisory, Chief Counsel’s Office

Date: April 3, 2024

Subject: Meeting with representatives from the International Association of Credit Portfolio Managers (IACPM) to discuss: Notice of Proposed Rulemaking: “Regulatory Capital Rule: Large Banking Organizations and Banking Organizations with Significant Trading Activity”

Staffs of the Federal Deposit Insurance Corporation, Federal Reserve System, and Office of the Comptroller of the Currency (collectively, the “agencies”) met with representatives from the International Association of Credit Portfolio Managers (IACPM) regarding the agencies’ Notice of Proposed Rulemaking on Regulatory Capital Rule: Large Banking Organizations and Banking Organizations With Significant Trading Activity (the “NPR”), which was published in the Federal Register on September 18, 2023 (88 FR 64028). The IACPM representatives discussed loan market information and their concerns with, and the impact of, the NPR’s proposed credit risk mitigation framework.

Attendees

OCC

Amrit Sekhon
Margot Schwadron
Andrew Tschirhart
Benjamin Pegg
Diana Wei
Venus Fan
Nadia Gerasimova
Kevin Korzeniewski
Carl Kaminski

FDIC

Benedetto Bosco
Iris Li
Ernest Barkett
Merritt Pardini
Adam Casella
Meraj Allahrakha
Lauren Brown
David Riley

Michael Maloney
Catherine Wood
Kyle McCormick
Peter Yen
Olga Lionakis
Huiyang Zhou

Federal Reserve Board

Johan Kind
Sarah Dunning
Cecily Boggs
Robin Oh
Sarah Dunning
Christopher Appel

IACPM

Jennifer Bearden
Marcia Banks
Som-lok Leung

Citi

Kevin Starrett

Barclays

Shubha Hoveland

Covenant Review

Ian Feng

Allen & Overy LLP

David Lucking
Vinod Aravind