



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

From: Daniel Perez, Counsel, Chief Counsel’s Office

Date: December 5, 2023

Subject: Meeting with CRE Finance Council to discuss Notice of Proposed Rulemaking:
“Regulatory Capital Rule: Large Banking Organizations and Banking Organizations
with Significant Trading Activity”

Staff of the Office of the Comptroller of the Currency, Federal Deposit Insurance Corporation, and Federal Reserve Board (collectively, the “agencies”) met with representatives of CRE Finance Council on November 20, 2023, regarding the agencies’ notice of proposed rulemaking entitled “Regulatory Capital Rule: Large Banking Organizations and Banking Organizations with Significant Trading Activity,” which was published in the Federal Register on September 18, 2023 (88 Fed. Reg. 64028). The CRE Finance Council representatives discussed the potential impact of the proposed rulemaking on the commercial real estate financing market, particularly in the context of securitizations. They also discussed concerns with aspects of the proposal, including the proposed universal cross default provision, the treatment of “other real estate,” and the treatment of undrawn commitments.

Attendees

OCC

Margot Schwadron
Amrit Sekhon
Benjamin Pegg
Daniel Perez
Justin Reiss

FDIC

Benedetto Bosco
Catherine Wood
Andrew Carayiannis
Bob Charurat
Ernest Barkett
Anjoly David
Brian Cox

Benjamin Klein
David Riley
Joanne Rose
Iris Li
Richard Smith
Olga Lionakis
Irina Leonov

Federal Reserve Board

Andrew Willis
Cecily Boggs
Lesley Chao
Matt McQueeney
Michael Suher
Nadya Zeltser
Nathan Brulport
Sarah Dunning
Vikram Ramnarain
Mark Buresh
Gillian Burgess
David Alexander
Jonah Kind
David Imhoff
Jasmin Keskinen
Ryan Rossner

CRE Finance Council

Lisa Pendergast
Sairah Burki
David McCarthy

Tiber Creek Group

Drew Cantor

Mayer Brown

Matthew Bisanz
Eric Reilly
