

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

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

Date: March 15, 2024

Subject: Meeting with representatives from State Street to discuss: Notice of Proposed Rulemaking: “Regulatory Capital Rule: Large Banking Organizations and Banking Organizations with Significant Trading Activity”

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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 State Street 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 State Street representatives discussed their concerns with, and the impact of, the NPR’s proposed capital treatment of seed investments.

## Attendees

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OCC

Amrit Sekhon  
Margot Schwadron  
Benjamin Pegg  
Venus Fan  
Diana Wei  
Carl Kaminski

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FDIC

Benedetto Bosco  
Ryan Billingsley  
Iris Li  
Catherine Wood  
Ernest Barkett  
Richard Smith  
Andrew Carayiannis  
Kyle McCormick  
Merritt Pardini  
Keith Bergstresser  
Brian Cox  
Adam Casella

Bob Charurat  
Meraj Allahrakha  
Olga Lionakis  
Huiyang Zhou  
David Riley  
Michael Maloney

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Federal Reserve Board

Andrew Willis  
Johan Kind  
Nadya Zeltser  
Cecily Boggs  
Diana Lercosan  
David Lynch  
Gillian Burgess

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State Street

Robert McKeon,  
Joe Berry  
Timothy Corbett  
Tobias Kraus  
Kasey Lekander  
Daniel Kolger  
Fabrice Dumont