

To: Public Comment File – Docket No. OCC–2023–0011

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

Date: March 19, 2024

Subject: Meeting with representatives from CreditSights, Inc., to discuss: Notice of Proposed Rulemaking: “Long-Term Debt Requirements for Large Bank Holding Companies, Certain Intermediate Holding Companies of Foreign Banking Organizations, and Large Insured Depository Institutions”

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Staff of the Federal Deposit Insurance Corporation, Federal Reserve System, and Office of the Comptroller of the Currency (collectively, the “agencies”) met with representatives of CreditSights, Inc., regarding the agencies’ Notice of Proposed Rulemaking on Long-Term Debt Requirements for Large Bank Holding Companies, Certain Intermediate Holding Companies of Foreign Banking Organizations, and Large Insured Depository Institutions (the “NPR”), which was published in the *Federal Register* on September 19, 2023 (88 *Fed. Reg.* 64524).

The representatives from CreditSights discussed aspects of the bank debt market, including demand for bank debt, characteristics of bank debt purchasers, denomination of such debt, liquidity issues, and differences between debt issued by banks compared to debt issued by bank holding companies. CreditSights representatives also discussed changes to the bank debt market that have occurred since the failure of three large banks in 2023.

#### **Attendees**

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OCC

Amrit Sekhon  
Andrew Tschirhart  
JungSup Kim  
Daniel Perez  
Bianca Werner  
Carl Kaminski

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FDIC

Elizabeth Falloon  
Andrew Felton  
Bruce Hickey  
Shoufen Hu  
Dena Kessler

Andrew Lubash  
Brendan Mazur  
Robert Meiers  
Michael Norton  
Julia Paris  
Jacques Schillaci  
R. Penfield Starke  
Kenneth Stinson  
F. Angus Tarpley III  
Ryan Tetrick  
Celia Van Gorder  
Yan Zhou

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Federal Reserve Board

Lars Arnesen  
James Caldera  
Lesley Chau  
Ryan Engler  
Jacob Fraley  
Charles Gray  
Diomedios Jara  
Benjamin Kay  
Brian Kesten  
Francis Kuo  
Vivien Lee  
Molly Mahar  
Reena Sahni  
Jay Schwarz

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CreditSights, Inc.

Jacob DiSavino  
Jesse Rosenthal  
Cody Stockton

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