

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

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

Date: May 30, 2024

Subject: Meeting with representatives from Morgan Stanley 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”

Staff of the Office of the Comptroller of the Currency met with representatives of Morgan Stanley 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 Morgan Stanley representatives discussed their views on the proposed rule, including the scope of the long-term debt requirements and their potential applicability to depository institutions (*i.e.*, the proposed *internal* LTD requirements), as well as the proposed minimum denomination requirement for long-term debt issuances.

Attendees

OCC

Andrew Tschirhart
Ankit Shah
Daniel Perez
Carl Kaminski

Morgan Stanley

Lucy Brusco
Ed Reilly
Kevin Sheehan
Amanda Williams
Sabrina Binte
