

## **MEMORANDUM**

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

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

Date: May 30, 2024

Subject: Meeting with representatives from the Investment Company Institute ("ICI"), Nuveen, State Street, JP Morgan Chase, BNY Mellon, and Debevoise & Plimpton LLP 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, the Federal Deposit Insurance Corporation, and the Federal Reserve System met with representatives from ICI regarding the agency's 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 ICI representatives discussed the NPR's proposed capital treatment of seed capital investments and closed end funds and the proposed publicly listed requirements, as described further in their comment letters. The ICI representatives recommended that the federal banking agencies issue a re-proposal of the NPR.

## Attendees

OCC	Andrew Tschihart Venus Fan Carl Kaminski	
FDIC	Bob Charurat Richard Smith Huiyang Zhou Iris Li Catherine Wood Anjoly David Ernest Barkett Michael Maloney Merritt Pardini Keith Bergstresser Peter Yen	

	Richard Smith Lauren Brown Benedetto Bosco Ryan Billingsley	
Federal Reserve Board	Shooka Saket David Alexander Christopher Appel Daniel Schwindt David Imhoff Katarina Liviana Nadya Zeltser Vikram Ramnarain Sarah Dunning Aakash Jani Abigail Roberts Cecily Boggs Mark Buresh Matthew McQueeney Andrew Willis	
ICI	Rachel Graham	
State Street	Robert McKeon Karen Gallagher Timothy Corbett	
JP Morgan Chase	Joseph O'Connor Christopher Cafiero	
BNY Mellon	Manoo Halati Stephan Bonte	
Debevoise and Plimpton	Chen Xu Dave Tejas Tea Baldwin	

Nuveen Nate Jones John McCann