

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

From: Carl Kaminski, Assistant Director, Bank Advisory

Date: December 5, 2023

Subject: Meetings Between Staff of the Office of the Comptroller of the Currency and Representatives of the Secured Finance Network to discuss: Notice of Proposed Rulemaking: “Regulatory Capital Rule: Large Banking Organizations and Banking Organizations with Significant Trading Activity”

On December 5, 2023, staff of the Office of the Comptroller of the Currency met with representatives of the Secured Finance Network 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 Secured Finance Network representatives discussed the potential impact of the proposed rulemaking on asset-based lending. In particular, they argued for greater recognition of non-financial collateral (such as a borrower’s inventory and/or receivables) in the Federal banking agencies’ risk-based capital regulations.

Attendees

OCC

Amrit Sekhon
Benjamin Pegg
Andrew Tschirhart
Venus Fan
Carl Kaminski

Secured Finance Network

Richard Gumbrecht
Michele Ocejó
Bill Mayer
Laura Jakubowski
Richard Kohn
Lou Goldstein