

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

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

Date: February 27, 2024

Subject: Meeting with representatives from the Securities Industry and Financial Markets Association (SIFMA) and the Asset Management Group of SIFMA (SIFMA AMG) and several of their member institutions 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 Federal Deposit Insurance Corporation, Federal Reserve System, and Office of the Comptroller of the Currency (collectively, the “agencies”) met with representatives of SIFMA and SIFMA AMG 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 SIFMA and SIFMA AMG representatives discussed their views on the NPR, including the proposed requirements at both the holding company and bank levels and the proposed minimum denomination requirement for long-term debt issuances.

## Attendees

---

OCC

Andrew Tschirhart  
Jung Sup Kim  
Joanne Phillips  
Carl Kaminski

---

FDIC

Elizabeth Falloon  
Andrew Felton  
Bruce Hickey  
Dena Kessler,  
Andrew Lubash  
Michael Norton  
Julie Paris  
Jacques Schillaci

Ryan Singer  
Richard Starke  
Kenneth Stinson  
Angus Tarpley III  
Ryan Tetrick  
Celia Van Gorder

---

Federal Reserve Board

Lars Arnesen  
Lesley Chao  
Ryan Engler  
Jacob Fraley  
Charles Gray  
Benjamin Kay  
Brian Kesten  
Francis Kuo  
Vivien Lee  
Reena Sahni  
William Treacy

---

Federal Reserve Bank of New York

Diosmedis Jara

---

Federal Reserve Bank of Richmond

Mark House

---

SIFMA

Carter McDowell  
Peter Ryan  
Joe Seidel  
Guowei Zhang

---

SIFMA AMG

Kevin Elrich  
Lindsey Keljo

---

Charles Schwab

Anna Harrington

---

JP Morgan Chase

Felton Booker  
Christopher Cafiero  
Alizeh Hussain

---

Bank of America

Bengt Redlinger

---

Morgan Stanley

Lucy Brusco

---

Goldman Sachs

Caroline Kraus

---

HSBC

Brian Salley

---

SMBC

Jennifer Imler  
Kevin Parker

---

BNP Paribas

Michele Jones  
Jeff Siegel