

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

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

Date: February 23, 2024

Subject: Meeting with representatives from the International Association of Credit Portfolio Managers (“IACPM”), Clifford Chance, Citibank, and JP Morgan to discuss: Notice of Proposed Rulemaking: “Regulatory Capital Rule: Large Banking Organizations and Banking Organizations with Significant Trading Activity”

Staffs of the Federal Deposit Insurance Corporation, Federal Reserve System, and Office of the Comptroller of the Currency (collectively, the “agencies”) met with representatives from IACPM, Clifford Chance, Citibank, and JP Morgan (collectively, the “credit portfolio manager representatives”) regarding the agencies’ 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 credit portfolio manager representatives discussed their concerns with, and the impact of, different aspects of the NPR as they relate to credit default swaps and synthetic securitizations.

Attendees

OCC

Andrew Tschirhart
Margot Schwadron
Amrit Sekhon
Kevin Korzeniewski
Christopher Rafferty
Benjamin Pegg
Venus Fan
Jung Sup Kim
Carl Kaminski

FDIC

Benedetto Bosco
Iris Li
Catherine Wood
Anjoly David
Ernest Barkett
David Riley

Richard Smith
Ashby Hilsman
Andrew Carayiannis
Peter Yen
Merritt Pardini
Keith Bergstresser
Brian Cox
Adam Casella
Bob Charurat
Meraj Allahrakha
Olga Lionakis
Huiyang Zhou
Michael Maloney
Kyle McCormick

Federal Reserve Board

Sarah Dunning
Andrew Hartlage
Gillian Burgess
David Imhoff
Brian Chernoff
David Alexander
Isabel Escharte
Abigail Roberts

IACPM

Jennifer Bearden
Som-lok Leung
Joulia Tamar

JPMorgan

Lauren Jones

Citibank

Michael Cooney
Peter Jerauld
Sanjeev Ganjoo

Clifford Chance

Gareth Old
Young Kim
Jeffrey Berman