

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

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

Date: February 14, 2024

Subject: Meeting with representatives from the Bank Policy Institute (BPI) and several of its 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 and counsel of BPI and several BPI member banking organizations (listed below) 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). BPI and representatives of member banking organizations discussed their views on the proposed rule, including the proposed calibration of the long-term debt requirements, the proposed requirements at both the holding company and bank levels, and the proposed minimum denomination requirement for long-term debt issuances.

Attendees

OCC

Amrit Sekhon
Margot Schwadron
Andrew Tschirhart
Jung Sup Kim
Daniel Perez
Joanne Phillips
Carl Kaminski

FDIC

Richard Starke
Andrew Felton
Elizabeth Falloon
Ryan Tetrick
Kenneth Stinson
Ryan Singer

Michael Norton
Dena Kessler
F. Angus Tarpley
Andrew Lubash
Julie Paris
Zrinka Dusevic
Heidi Kim
Jacques Schillaci
Celia Van Gorder
Jenny Traille

Federal Reserve Board

Molly Mahar
Juan Climent
Helen Xu
Lesley Chao
Francis Kuo
Lars Arnesen
Charles Gray
Reena Sahni
Brian Kesten
Jacob Fraley
Vivien Lee
William Treacy
Benjamin Kay
James Caldera

Federal Reserve Bank of New York

Diosmedis Jara
Phillip Weed

Federal Reserve Bank of Richmond

Mark House

BPI

John Court
Tabitha Edgens
Haelim Anderson
Josh Smith
Felipe Rosa

Sullivan and Cromwell

Ben Weiner
Leanne Van Allen

Ally Financial

Elliot Kahan

Charles Schwab Corp.

Anna Harrington

Discover Financial Services

Diana Thompson

JPMorgan Chase

Felton Booker

Morgan Stanley

Lucy Brusco

PNC Financial Services Group

Camden Williams

TD Bank Group

Michael Blayney
