

**Meeting Between Federal Reserve Staff and the
Financial Services Roundtable (FSR) Council of Chief Risk Officers
February 9, 2012**

Participants: Michael Gibson, Mark Van Der Weide, Barbara Bouchard, Art Lindo, Ann Lee Hewko, Lisa Ryu, Pamela Martin, and Molly Mahar (Federal Reserve)

FSR: Dean Pappas (Allstate Corporation); Stephanie Richard (Ally Financial); Steve Merritt (Ally Financial); Russell Playford (BancWest Corporation); Mark T. Wilson (Bank of America Corporation); Brian G. Rogan (Bank of New York Mellon Corp.); Kevin Storm (BB&T Corporation); Peter A. Schnall (Capital One Financial Corporation); Tina Locatelli (Citigroup, Inc.); Michael Michalak (Comerica Incorporated); Dave Sutter (Discover Financial Services); John Noone (Ford Motor Credit Company LLC); Keith Morgan (GE Capital); David Brown (GE Capital); Charles S. Hyle (KeyCorp); Michael W. Mahaffey (Nationwide Financial Services, Inc.); Gideon A. Pell (New York Life Insurance Company); Michael J. Little (PNC Financial Services Group); Michael Streck (Principal Financial Group); Matt Lusco (Regions Financial Corporation); Molly Wilkinson (Regions Financial Corporation); Joseph J. Barry (State Street Corporation); Nancy Loucks (State Street Corporation); Thomas Freeman (SunTrust Banks, Inc.); Mark Midkiff (Union BanCal Corporation); Jacqui Peace (USAA Federal Savings Bank); Michael J. Loughlin, Eugene Katz and Eric Lloyd (Wells Fargo & Company); Don Truslow (Financial Stability Industry Council (FSIC)); Rich Whiting, Rich Foster (FSR); Jim Beardi (M&T Bank Corporation); Bill Githens (Risk Management Association); Paul Lee (Debevoise & Plimpton); Jerry Loeser (Winston & Strawn LLP); Jim Sivon (Barnett Sivon & Natter, P.C.); and Greg Wilson (Gregory P. Wilson Consulting)

Summary: Federal Reserve staff met with representatives of the Financial Services Roundtable Council of Chief Risk Officers to discuss the Board's notice of proposed rulemaking implementing sections 165 and 166 of the Dodd-Frank Act. The FSR representatives sought clarity on several elements of the proposed enhanced risk management standards, including the reporting lines and requirements of the Chief Risk Officer and the responsibilities assigned to the risk committee of the board of directors, and certain elements of the proposed early remediation standards. The representatives also sought clarity on the treatment of savings and loan holding companies and nonbank financial companies designated by the Financial Stability Oversight Council under the proposal.

The representatives expressed concerns about stress test disclosure and timing as well as the burden associated with stress test data collections. The representatives requested that the Federal Reserve provide clarity on current and forthcoming data collections so that firms can avoid unnecessary investments in data and IT systems that are inconsistent with regulatory reporting requirements. The group also raised concerns about the proposed alternatives to credit ratings included in the interagency proposal implementing changes to the market risk capital rules.