Meeting Between Federal Reserve Board Staff
and Representatives of Americans for Financial Reform
October 20, 2010

Participants: Mark Van Der Weide, Anna Lee Hewko, Molly Mahar, David Lynch, Michael Gibson, Kieran Fallon, Jeremy Newell and Paige Pidano (Federal Reserve Board)

Heather McGhee, Craig Mehall, Heather Slavkin, Dennis Kelleher, Dana Chasin, David Arkush, Ed Mierzwinski, Gerald Epstein, Jane D'Arista, Jennifer Taub and Lisa Donner (Americans for Financial Reform)

Summary: Federal Reserve Board staff met with representatives of Americans for Financial Reform ("AFR") to discuss implementation of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank"). During this discussion, AFR's representatives presented their overall views on the Volcker Rule, the Financial Stability Oversight Council's ("FSOC") authority to designate non-bank financial companies for heightened supervision, and the requirements under Dodd-Frank related to enhanced prudential standards for systemically important firms. Among other matters discussed during the meeting were: The recent FSOC request for information on the Volcker Rule Study and the FSOC's Advance Notice of Proposed Rulemaking on the designation of systematically important non-bank financial companies; the difficulties in identifying the systemic footprint of firms; the difficulties in identifying what, if any, incentives exist for firms to become "too big to fail" and how to offset such incentives; the ability of the FSOC and the Office of Financial Research to collect data; existing data gaps with respect to certain types of firms; the statutory definition of "predominantly engaged in financial activities;" and the difficulties in distinguishing between proprietary trading and market-making for purposes of the Volcker Rule.