

**Meeting Between Federal Reserve Board Staff and  
Representatives of Capstone, LLC and Bank Investors  
November 8, 2011**

**Participants:** Maryann Hunter, Norah Barger, Art Lindo, Tim Clark, Anna Lee Hewko and Jennifer Judge (Federal Reserve Board)

David Barrosse, Evan Thomas (Capstone); Alexandru Popa (Capital Research); Craig Peskin (Highfields Capital); Vincent Montemaggiore (Fidelity Investments); Matthew Antle (Putnam Investments); James Esdaile (Wellington Management); and Ravi Chopra (Samlyn Capital)

**Summary:** Board staff met with representatives of Capstone, LLC and major bank investors to discuss capital plans as related to the notice of proposed rulemaking published on June 17, 2011 and related Basel III issues. Representatives of Capstone and bank investors inquired about the time line and process related to the capital plan rulemaking. Staff from the Federal Reserve Board noted that it has reviewed the public comments received through the rulemaking process and will reflect this feedback in the final rule, which is forthcoming. Representatives also asked about the communication channels through which they would receive information about the new regulatory requirements related to capital planning. Board staff indicated that, once published, the final rule will contain all of the requirements, and the instructions to the reporting templates for the capital plan rule will also contain information regarding supervisory expectations related to the rule.

Representatives also inquired as to whether the banking agencies would institute a countercyclical capital buffer as outlined in the Basel III capital standards. Board staff indicated that the United States has agreed to implement a countercyclical capital buffer and would do so at a future date according to the standard public comment process.