Meeting between Federal Reserve Board Staff And Representatives of the Institute of International Bankers August 9, 2012

Participants: Jordan Bleicher, Constance Horsley, Michael Hsu, Linda Jeng, Kwayne Jennings,

Molly Mahar, Tudor Rus, and Mark Van Der Weide (Federal Reserve Board)

Derek Bush, Macey Levington, Sarah Miller (Institute of International Bankers)

Summary: Staff of the Federal Reserve Board met with representatives of the Institute of International Bankers to discuss the application of enhanced prudential standards under section 165 of the Dodd-Frank Wall Street Reform and Consumer Protection Act to foreign banking organizations (FBOs). The Institute of International Bankers expressed concerns about "one-size-fits-all" approaches and encouraged Federal Reserve staff to pursue a supervisory-based approach that can be tailored to individual firms.

In addition, the Institute of International Bankers described several respects in which it is requesting the CFTC modify the CFTC's July 12, 2012, Exemptive Order regarding compliance with certain swaps regulations.