Meeting between Federal Reserve Staff and Representatives of JP Morgan March 16, 2012

Participants: Anna Harrington, Mark Van der Weide, and Patricia Yeh (Federal Reserve Staff)

Greg Baer, Robin Doyle, Adam Gilbert, and Kathryn McCulloch (JPMorgan Chase)

Summary: Staff of the Federal Reserve met with representatives of JP Morgan to discuss the proposed rule for single counterparty credit limits under section 165(e) of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Among the issues raised by the JP Morgan Chase ("JPMC") representatives were the proposed rule's approach to valuing credit exposure arising out of credit and equity derivatives, the use of internal models-based approach to measure credit exposure, the use of notional amount for an eligible credit or equity derivative hedge as a credit exposure to the protection provider, and the treatment of central counterparties, states, and foreign entities as counterparties. Staff invited JPMC to provide written comments on the proposed rule.