



BOARD OF GOVERNORS
OF THE
FEDERAL RESERVE SYSTEM
WASHINGTON, D. C. 20551

ADDRESS OFFICIAL CORRESPONDENCE
TO THE BOARD

March 18, 2010

Patrick S. Antrim, Esq.
Assistant General Counsel
Bank of America Corporation
Legal Department
101 South Tryon Street
Charlotte, North Carolina 28255

Dear Mr. Antrim:

On August 20, 2007, the Board approved a temporary exemption from section 23A of the Federal Reserve Act¹ to allow Bank of America, N.A., Charlotte, North Carolina, to engage in reverse repurchase agreements and securities borrowing transactions with its affiliated broker-dealer in conjunction with actions the Board took simultaneously to provide insured depository institutions with access to term loans at the discount window.² These activities were intended to allow the bank to extend credit to market participants in need of short-term liquidity to finance the participants' holdings of certain mortgage loans and asset-backed securities.

The Board's approval noted that the exemption was temporary and available only as long as the special accommodation at the discount window was available.³ On February 18, 2010, the Board announced that, in light of the continued improvement in financial markets, the typical maximum maturity for primary credit loans at the discount window would be shortened to overnight, effective March 18, 2010. In light of this normalization of the term for discount window loans, the Board has terminated the temporary section 23A exemption.

Very truly yours,

A handwritten signature in cursive script that reads "Robert deV. Frierson".

Robert deV. Frierson
Deputy Secretary of the Board

cc: Federal Reserve Bank of Richmond

¹ 12 U.S.C. § 371c.

² Board letter to Patrick S. Antrim, Esq. (Bank of America Corporation), dated August 20, 2007.

³ Id.