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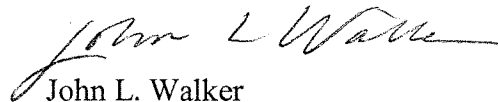
Re: Docket No. OP-1158

Ms. Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington D.C. 20551

Dear Ms. Johnson:

In connection with section 106 of the Bank Holding Company Act Amendments of 1970 ("section 106") and the Board's proposed interpretation and supervisory guidance regarding section 106, enclosed is a submission by Bank of America Corporation, Citigroup Inc., Deutsche Bank AG, J.P. Morgan Chase & Co., and UBS AG supporting a proposed "large customer" safe-harbor exemption from the coverage of section 106 and a proposed coercion interpretation of section 106.

Very truly yours,


John L. Walker

Enclosure

cc: Scott G. Alvarez
Kieran Fallon
Mark E. Van Der Weide
Andrew S. Baer
Robin Prager
Ron Borzekowski
Kenneth Brevoort

Joyce Hansen
Ivan Hurwitz

Enclosure available upon request. Call Sec'y Office

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