

To: Basel II NPR Public File
From: Mark Van Der Weide
Date: April 25, 2007
Re: Meeting of Federal Reserve Staff and Deutsche Bank

Mr. Andreas Gottschling of Deutsche Bank, Federal Reserve Board Governor Randall Kroszner, and Barbara Bouchard, Mark Van Der Weide, and Pat Soriano of Federal Reserve Board staff met on April 24, 2007 to discuss certain aspects of the interagency notice of proposed rulemaking (NPR) and related supervisory guidance that would implement the Basel II risk-based capital framework in the United States. Mr. Gottschling identified several key concerns with the NPR and supervisory guidance, including the differences between the NPR and the European CRD in the definitions of key terms and issues of regulatory burden. He specifically highlighted the U.S. Basel II-related implementation difficulties faced by foreign banks with U.S. operations, and indicated that Deutsche Bank would be submitting a written comment on the U.S. Basel II supervisory guidance shortly.