

Docket No. R-1384 (Regulation Z)

Meeting at the Federal Reserve Board on April 8, 2010

On April 8, 2010, representatives from HSBC met with officers and staff from the Board's Division of Consumer and Community Affairs, including Leonard Chanin (Deputy Director) and Jim Michaels (Assistant Director). Representing HSBC were Shivraj Mundy, Brian Hughes, James Hanley, Jim Huizinga, and Karl Kaufman.

The meeting focused on proposed amendments to Regulation Z requiring that credit card penalty fees be reasonable and proportional to the violation of the account terms. The proposed amendments implement provisions of the Credit Card Accountability Responsibility and Disclosure Act of 2009 that go into effect on August 22, 2010. HSBC expressed concern regarding the impact of the proposed amendments on its operations.