

**Meeting between Federal Reserve Board Staff and Representatives of the  
Institute of International Bankers  
December 16, 2011**

**Participants:** Sarah Miller and Richard Coffman (Institute of International Bankers); Derek Bush and Katherine Mooney Carroll (Cleary Gottlieb Steen & Hamilton LLP)  
  
Scott Alvarez, Laurie Schaffer, and Anna Harrington (Federal Reserve Board)

**Summary:** Staff of the Federal Reserve Board met with representatives of the Institute of International Bankers (“IIB”) to discuss the restrictions on proprietary trading activities and hedge fund and private equity fund activities under section 619 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (also known as the “Volcker Rule”). The IIB representatives referenced the IIB’s May 10, 2011 comment letter and discussed three concerns with the proposed rule, including: (1) the activities that the phrase “solely outside of the United States” is intended to modify; (2) a number of compliance issues including with respect to investments in covered funds; and (3) the need for an exemption from the proposed rule for proprietary trading in certain non-U.S. government securities.

IIB representatives also referenced the IIB’s November 29, 2011 white paper regarding the “swaps push-out” requirements under section 716 of the Dodd-Frank Act. They expressed concern with that section of the statute and noted their desire for guidance on this section.