

**Meeting between Federal Reserve Board Staff
and Representatives of Bank of America
May 4, 2011**

Participants: Thomas Boemio, William Treacy, April Snyder, Sebastian Astrada and Flora Ahn (Federal Reserve Board); and Adam Ashcraft (Federal Reserve Bank of New York)

Mike Malloy, Luke Scolastico, Kevin MacMillan and Caroline Tsai (Bank of America)

Summary: Staff of the Federal Reserve Board and the Federal Reserve Bank of New York met with representatives of Bank of America to discuss the proposed rules to implement the requirements of section 941 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Among other matters discussed during the meeting were: the intent and structure of the proposed premium capture cash reserve account; the proposed definition of a “qualified residential mortgage” (QRM), and the credit history requirements and servicing standards included in the proposed definition; alternative risk retention options; the implications related to the inability to commingle QRMs and non-QRMs in a securitization; and the treatment of government-sponsored enterprises under the proposed rules.

The representatives of Bank of America expressed concerns regarding the potential impact of the proposed premium capture cash reserve account, the servicing standards in the QRM definition, and the treatment of government-sponsored enterprises on the private securitization market and mortgage industry. The representatives of Bank of America also advocated for either a looser definition of QRM or the ability to commingle QRMs and non-QRMs, with risk retained in the non-QRMs through participations held by the securitizer, and expressed a preference for the usage of credit scores rather than the credit history requirements included in the proposed QRM definition.