

**Meeting between Federal Reserve Board staff and
Representatives of Barclays Capital
January 30, 2013**

Participants: Sean Campbell and Anna Harrington (Federal Reserve Board)

Keith Jones (Barclays Capital)

Summary: A representative of Barclays Capital (“Barclays”) met with Board staff to discuss general implementation and timing concerns relating to Title VII of the Dodd-Frank Act, including the proposed rule issued by the Federal Reserve and other prudential regulators on margin and capital requirements for covered swap entities under Title VII of the Dodd-Frank Act.

In particular, the representative discussed (i) the desire and capability for all swaps to be centrally clearable in the next couple of years; (ii) the ability to offset cleared and uncleared swaps as well as possibly pre-effective date swaps with those swaps subject to clearing and margin requirements; (iii) the availability of unencumbered assets for funding potential margin requirements; (iv) the impact on funding of the liquidity coverage ratio and leverage ratio; (v) the relationship and incentives created by the interaction of capital and margin; (vi) the potential impact of a capital charge for swaps with end-users that are exempt from margin requirements; (vii) mechanisms to reduce the absolute amount of initial margin, including through the use of thresholds; and (viii) certain issues related to implementation, including valuation concerns due to possible differences in models.