

**Meeting between Federal Reserve Board Staff
and Representatives of the International Swaps and Derivatives Association
October 4, 2010**

Participants: Pat White, Mark Van der Weide, David Lynch, Kieran Fallon, and Jeremy Newell (Federal Reserve Board)

Raymond Natter (Barnett Sivon & Natter); James Sivon (Barnett Sivon & Natter); Bryan Murtagh (UBS); Rick Ostrander (Morgan Stanley); and Mary Johannes (ISDA)

Summary: Staff of the Federal Reserve Board met with representatives of the International Swaps and Derivatives Association (“ISDA”), which represents dealers in swaps and other derivatives products, to discuss section 716 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”), which requires dealers to push certain swaps activity out of banks and into bank affiliates. In particular, ISDA raised questions and concerns about the effective date of section 716, the meaning of “federal support,” clarity of provisions related to sections 23A and 23B of the Federal Reserve Act; the definition of hedging; the need for technical corrections related to provisions affecting foreign institutions; the application of section 716 of the Act to activity outside the United States; and the additional complexity that section 716 of the Act may introduce into the corporate structure of banking organizations.