

**Meeting Between Federal Reserve Bank of New York Staff
and Representatives from JPMorgan Chase & Co.
June 28, 2011**

Participants: Brian Sack, Lorie Logan, Michael Holscher, Mari Baca, Anna Iacucci, Kathryn Chen and Janine Tramontana (Federal Reserve Bank of New York)

Matt Zames, Jeremy Barnes, Don Thompson (JPMorgan Chase & Co.)

Summary: Staff of the Federal Reserve Bank of New York and representatives of JPMorgan Chase & Co. discussed that firm's views on the Notice of Proposed Rulemaking Margin and Capital Requirements for Covered Swap Entities (Docket No. R-1415). JPMorgan Chase & Co. representatives noted that the firm had recently submitted a comprehensive comment letter on the proposal and informed the Federal Reserve Bank staff that the representatives' principal objection to the proposal is that U.S. banks and their non-U.S. branches, subsidiaries and affiliates (together, "U.S. swap entities") operating internationally would suffer a competitive disadvantage as compared to non-U.S. banks for their activities outside the U.S. Representatives from JPMorgan Chase & Co. noted that the competitive disadvantage to U.S. swap entities is likely to be greatest in emerging market jurisdictions. Representatives from JPMorgan Chase & Co. also expressed the view that increased capital requirements for non-cleared swaps would be less competitively harmful to U.S. banks than the current proposal on margin.