

**Meeting Between Federal Reserve Board Staff
And Representatives of the American Bankers Association, The Clearing House,
and the Financial Services Roundtable
August 31, 2011**

Participants: Art Lindo, Anna Lee Hewko, Tom Boemio, Ben McDonough, Christine Graham, Tim Clark, Betsy Cross, and Holly Kirkpatrick (Federal Reserve Board)

Eli Peterson, Paul Saltzman and Daniel McCardell (The Clearing House); Mark Welshimer, Joel Alfonso (Sullivan & Cromwell); Andrew Miller (PNC); Alexander McWhorter (Citigroup); Jeffrey Richardson (Fifth Third Bank); Donald Truslow (Financial Services Roundtable); Ayan Dagupta and James Beardi (M&T Bank); and Lisa Taylor (Northern Trust Bank)

Summary: Representatives from the American Bankers Association, the Clearing House, the Financial Services Roundtable, PNC, Citigroup, Fifth Third Bank, M&T Bank, and Northern Trust Bank met with staff from the Federal Reserve Board on August 31, 2011, to provide comments on the Board's notice of proposed rulemaking requiring annual capital plans.

The commenters expressed concern that the timing of the capital plan submission and review would interrupt firms' ability to make capital distributions in the first quarter of each year. They proposed a submission window that staggered firms' capital plan submissions and requested that a non-objection would cover a four quarter period following the date of the non-objection. In addition, commenters requested clarity on what actions or events could require firms to re-submit an approved capital plan and asked for additional information on the grounds for objection of a capital plan. Commenters also requested clarity on when the Federal Reserve can make decisions on a firm's capital actions and expressed concern that limits on capital actions, such as share repurchases and dividend payouts, would be disruptive to the firms. Board staff indicated that more information related to these topics raised by the commenters would be included in the final rule.