

**Meeting Between Federal Reserve Staff and Representatives of the
Bundesverband deutscher Banken (Association of German Banks)
July 19, 2012**

Participants: Kathleen O’Day, Chris Paridon, and Dominic Labitzky
(Federal Reserve Staff)

Dr. Michael Kemmer and Dr. Gabriele Spieker
(Association of German Banks)

Summary: Staff of the Federal Reserve participated in a meeting with representatives of the Association of German Banks (the “Representatives”) to discuss implementation of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”), including the proposed rules implementing the restrictions on proprietary trading and hedge fund and private equity fund activities under section 619 of the Dodd-Frank Act (also known as the “Volcker Rule”), and the enhanced prudential standards and early remediation requirements for covered companies under sections 165 and 166 of the Dodd-Frank Act.

Among matters discussed were the Representatives’ views regarding: the potential extra-territorial impact of the November 2011 proposal to implement the Volcker Rule, specifically with respect to the proposal’s definition of “covered fund,” compliance obligations for foreign banking entities, and treatment of foreign sovereign debt instruments; and the application of enhanced prudential standards and early remediation requirements to foreign banking organizations operating in the United States.