

**Meeting between Federal Reserve Board Staff  
and Representatives of Barclays  
February 15, 2011**

**Participants:** Emma Bailey, Nadine Cancell, Joseph Corcoran, Patrick Durkin, Alan Kaplan, Richard Konefal, Allison Parent, Jason Quinn and Anna Shender (Barclays)

Scott Alvarez, Brian Knestout, Jeremy Newell, Christopher Paridon and Mark Van der Weide (Federal Reserve Board)

**Summary:** Staff of the Federal Reserve Board met with representatives of Barclays to discuss the restrictions on proprietary trading and hedge fund and private equity fund activities under section 619 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (also known as the “Volcker Rule”).

Among matters discussed in the meeting were Barclay’s views regarding: the potential impact of the Volcker Rule on Barclay’s market-making and related business lines, including clients of such services; the difficulties of using “customer initiated” trade tagging as a way to differentiate proprietary trading from permitted activities; potential scope of the risk-mitigating hedging exemption provided by the statute and how Barclay’s currently categorizes its hedging transactions; and potential characteristics of market-making related activities, including the use of metrics or similar risk measurements (e.g., risk, revenue-to-risk, inventory, customer, and qualitative metrics) in order to differentiate between market-making related activities and proprietary trading.