

**Meeting Between Governor Raskin and  
Representatives of the Maryland Bankers Association  
October 3, 2012**

**Participants:** Governor Sarah Bloom Raskin, Madelyn Marchessault, and Margaret Miller  
(Federal Reserve staff)

**Maryland Bankers Association:** Cathy Alexander, Daniel Barbaree, Todd Bear,  
John Bond Jr., James Brown, James Cornelsen, Robert DeAlmeida,  
Allison Fields, William Grant, Cheri Heidel, Michael Hough, Stephen Kensinger,  
David Koch, Daniel Kovac, Kristopher Kozlowski, Miriam Lehman, Kim Liddell,  
Michael Livingston, Zachary Low, Edward Maddox, Michael Middleton,  
Calvin Miller Jr., Jessica Moliere, Kathleen Murphy, Edward Rice,  
Carissa Rodeheaver, John Scaldara Jr., Karen Turner, Jeffrey Weidley and  
Andrew Wells

**Summary:** Representatives of the Maryland Bankers Association met with Governor Raskin to discuss the joint notice of proposed rulemaking on regulatory capital requirements (Docket No. R-1442), which would implement provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Basel III regulatory capital reforms. Association members cited the complexity of the proposal and said compliance would be costly and unduly burdensome for community banks. Association members expressed concern that the proposal's risk-weighting provisions for residential mortgages would inhibit this activity at community banks to such an extent that their portfolios and ability to manage risks would be significantly affected. One association member expressed a specific concern about the proposed treatment of residential balloon mortgages, which this member said currently make up a fair amount of business at many community banks. Some association members also suggested that the proposal's method for calculating risk weights should be simplified. Another association member suggested that regulators establish a bank-size threshold below which banks would not be subject to the Basel III requirements.