

**Meeting Between Governor Raskin and the
Michigan Bankers Association
March 16, 2011**

Participants: Governor Sarah Raskin (Federal Reserve Board member), Madelyn Marchessault, and Jon Hiratsuka (Federal Reserve staff)

Michigan Bankers Association members: Dennis Koons, Arthur Johnson, Michael Manica, Joseph Manica, Erik Johnson, Robert Chapman, Stephen Ranzini, Harold Chaffin, Eric Eishen, and Ryan Zagone (American Bankers Association representative).

Summary: Members of the Michigan Bankers Association met with Governor Raskin to discuss the implementation of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank”). Many association members said community banks would experience heavy cost and compliance burdens from the large number of required rulemakings under Dodd-Frank that must be implemented in a limited period of time. Several members expressed concerns about the transfer of rulewriting authority for consumer protection laws to the Consumer Financial Protection Bureau. A member noted that although the incentive compensation provisions of Dodd-Frank were directed at large, complex institutions, the pending regulation could have unintended consequences for smaller banks. Regarding the Board’s proposed rulemaking on debit card interchange fees and routing, members generally noted that the proposed fee cap would result in substantial lost revenue for community banks and that the proposal’s exemption for banks below a certain asset size would not prevent them from facing significant competitive pressures.