

**Meeting Between Staffs of the Federal Reserve Board, the OCC, the FDIC, the FHFA, and  
the SEC, and Zions Bancorporation  
November 9, 2016**

**Participants:** Michael Solomon, Teresa Scott, Meg Donovan, Joe Maldonado, and Alyssa O'Connor (Federal Reserve Board); Debra Peery and Martha-Stewart Bates (Office of the Comptroller of the Currency); Annmarie Boyd, George Parkerson, Rosalind Bennett, and Corri Mattison (Federal Deposit Insurance Corporation); Mary Pat Fox and Lindsay Simmons (Federal Housing Finance Agency); and George Papadakis and Kevin Schopp (Securities and Exchange Commission)

Thomas E. Laursen and Scott Law (Zions Bancorporation)

**Summary:** Staffs of the Federal Reserve Board, the OCC, the FDIC, the FHFA, and the SEC met with representatives from Zions Bancorporation to discuss the NPR on Incentive-Based Compensation Arrangements (Dodd-Frank Act Section 956) (Docket No. R-1536). The Zions Bancorporation representatives discussed subjects raised in their comment letter on the proposal, including the definition of "significant risk taker," accounting issues, and deferral. The Zions Bancorporation representatives generally suggested that the proposed rule is too prescriptive, and noted that they would prefer greater simplification where possible. The representatives also raised concerns over competitive harm stemming from the proposed rule.

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