Meeting Between Staff of the Federal Reserve Board and Federal Deposit Insurance Corporation, and Representatives of the BMO Financial Group (BMO) November 13, 2023

Participants: Catherine A. Tilford, Tudor N. Rus, Mason Laird, Sarah Podrygula, and Brian Kesten (Federal Reserve Board)

Robert C. Connors, Jason P. Ahrenholtz, Matthew K. Valentine, Esther Rabin, and Monica Rashed (Federal Deposit Insurance Corporation)

Matt Riggs, Angelica Akaravorasate, Michael Coyne, Vandra Goedvolk, Jim Ho, Sharalyn Neeley, Rashmi Khanna, Corey McElveen, and Justine Hansen (BMO)

Summary: Staff of the Federal Reserve Board and Federal Deposit Insurance Corporation (the agencies) met with representatives of BMO related to the proposed Guidance for Resolution Plan Submissions of Foreign Triennial Full Filers (proposal). Representatives of BMO primarily commented on two specific topics regarding the proposal. First, BMO representatives requested that the agencies include in the final guidance an explanation of how a firm that is changing resolution strategies could satisfy the agencies' expectations, particularly given the need for time to implement a new strategy. Second, BMO representatives requested that the final guidance clarify how the public section of a resolution plan should address the agencies' expectations in the "Interaction with Group Resolution Plan" section of the proposal related to home-country resolution planning information.