To: Comment file for Notice of Proposed Rulemaking on Parent Companies of Industrial Banks and Industrial Loan Companies

(12 CFR Part 354), RIN 3064-AF88

From: Greg Feder, Counsel, Bank Activities Unit

Date: November 18, 2024

Subj: Meeting between FDIC Staff and BPI Representatives

On November 7, 2024, Staff of the FDIC met with representatives of the Bank Policy Institute (BPI) to discuss the FDIC's notice of proposed rulemaking (NPR) on Parent Companies of Industrial Banks and Industrial Loan Companies. The meeting related to BPI's support for certain aspects of the NPR and additional suggestions for the treatment of industrial banks and industrial loan companies. The NPR was published in the Federal Register on August 12, 2024.

BPI representatives:

- Paige Paridon, Senior Vice President, Senior Associate Counsel & Co-Head of Regulatory Affairs, Bank Policy Institute
- Erik Rust, Senior Vice President & Head of Government Affairs, Bank Policy Institute
- Joshua Smith, Vice President and Assistant General Counsel, Bank Policy Institute
- Eli Alper, Chief Counsel, Regulatory Policy, PNC

FDIC attendees:

- Patti Colohan, Associate Director, Risk Management Examinations Branch, Division of Risk Management Supervision (RMS)
- Greg Feder, Counsel, Bank Activities Unit, Legal Division
- Dawnelle Guyette, Senior Policy Analyst, Division of Depositor and Consumer Protection (DCP)
- Ben Klein, Supervisory Counsel, Bank Activities Unit, Legal Division
- Scott Leifer, Senior Review Examiner, RMS
- Amy Ledig, Counsel, Bank Activities Unit, Legal Division
- Sandy Macias, Chief, Risk Management Applications Section, RMS
- Rae-Ann Miller, Senior Deputy Director, RMS
- Paul Robin, Chief, Supervisory Policy Section, DCP
- Nick Ties, Acting Chief, Risk Management Applications Section, RMS
- Catherine Topping, Counsel, Bank Activities Unit, Legal Division