Meeting Between Governor Duke and Representatives of the Arkansas Bankers Association September 19, 2012

Participants: Governor Elizabeth Duke, Nancy Riley, Margaret Miller, and April Snyder (Federal Reserve staff)

Arkansas Bankers Association: Jerry Gentry, Kevin Thompson, Gerald Crawford, Daniel Robinson, Jennifer Ruhlman, Henry Smiley Jr., Davis Dickson, Sean Williams, Ivan Miles, Jerry Litty, Charles Blanchard, Charles Blanchard, John Freeman, Kenneth Hammonds, Eric Munson, and William Holmes

Summary: Representatives of the Arkansas Bankers Association met with Governor Duke to discuss recent and forthcoming regulations implementing the Dodd-Frank Wall Street Reform and Consumer Protection Act ("the Act") and their impact on community banks. Association members had concerns about the compliance burden resulting from required rulemakings under the Act. Some association members expressed concerns about whether the joint notice of proposed rulemaking on regulatory capital requirements (Docket No. R-1442) would impose unnecessarily burdensome requirements on community banks. Concerns noted about the proposal by association members included the elimination of trust preferred securities from inclusion in additional tier 1 capital, increased risk-based capital charges for balloon mortgages, and higher capital allocations for certain lines of credit. Association members also expressed concern about the potential effects of the proposal's capital portfolio requirements on their banks' liquidity risk.