Meeting Between Staff of Prudential Regulators and Representatives of Bank of America February 9, 2012

Participants: Sean Campbell (Federal Reserve Board); Robert Collender (Federal Housing

Finance Authority); John Feid (Federal Deposit Insurance Corporation); Kerri Firestone (Federal Reserve Bank of Richmond); Steven Koenig (Farm Credit Administration); Tim Nerdahl (Farm Credit Administration); Julia Pachos (Federal Reserve Bank of New York); Stephanie Pisto (Federal Reserve Board); Ryan Rehorn (Federal Reserve Bank of Richmond); Johanna Schwab (Federal Reserve Bank of New York); Caroline Smith (Office of the Comptroller of the Currency); and Peter Yen (Federal Deposit Insurance Corporation)

Dennis Albrecht, Ali Balali, Dan Coovadia, Jon Culley, Sarah Donnelly, Andres Fernandez, Tomo Kodama, Nick Kolick, Laura Kuntzevich, Mark Maupin, Mike O'Neill, Adam Shearer and Paula Smith (Bank of America)

Summary: Staff of the Prudential Regulators (Farm Credit Administration, Federal Deposit Insurance Corporation, Federal Housing Finance Authority, Federal Reserve Board and Office of the Comptroller of the Currency) met with representatives of Bank of America to discuss the bank's submission pursuant to a request for data on the quantitative impact of the Prudential Regulators' proposed rule on margin for uncleared swaps. Specific issues that were discussed included the specific numerical values that were reported by the bank as well as the methodologies and analyses that were conducted to produce the reported numerical values.