

**Meeting Between Staff of the Federal Reserve Board and The Credit Roundtable
February 26, 2016**

Participants: Michael Beall, Felton Booker, Mark Buresh, Greg Frischmann, and Mark Savignac (Federal Reserve Board)

David Knutson, John Grassano, Keven Maloney, Ian Carol, Carolyn Perlmuth, Scott Cavanagh, Mark Kehoe, and Jake Rath (The Credit Roundtable)

Summary: Staff of the Federal Reserve Board met with representatives of The Credit Roundtable to discuss the Board's outstanding proposal on long-term debt (LTD) and total loss-absorbing capacity (TLAC) requirements for the U.S. global systemically important banks (G-SIBs) and the U.S. intermediate holding companies (IHCs) of foreign G-SIBs. The Credit Roundtable representatives (i) encouraged the Board to include grandfathering provision that would permit U.S. G-SIBs to count outstanding long-term debt towards the LTD and TLAC requirements under the proposal, (ii) expressed concern with the definition of "eligible debt security" in the proposal, in particular the requirement that an eligible debt security not provide the holder of such debt with contractual rights to accelerate the payment of principal or interest on the instrument in certain circumstances, (iii) encouraged the Board to require public disclosures in connection with the proposed TLAC and LTD requirements, (iv) encouraged the Board to permit IHCs of foreign G-SIBs to meet the LTD/TLAC requirements with external debt issuances, and (v) expressed concern about the possible impact of the proposed requirements on market liquidity for G-SIB debt.