Meeting Between Governor Duke and Representatives of the North Carolina Bankers Association February 6, 2013

Participants:

Governor Elizabeth Duke (Federal Reserve Board member), Jennifer Gallagher, and Margaret Miller (Federal Reserve staff)

North Carolina Bankers Association: Brian Atkinson, Larry Barbour, Scott Biehle, Ronald Black, Simpson Brown, James Cherry, Samuel Collins, Thomas Combs, Mary Craver, James Engel, John Fox, Michelle Fox, Francis Gavigan Jr., Robert Hatley, Mark Holmes, Lindsey Johnson, Jon Keagle, Donald Lancaster, James Mahan III, Wayne Montgomery Jr., Timothy Moore, Robert Norris, Jerry Ocheltree, Norman Osborn, Clifton Painter, Kim Price, Renee Rhodes, Pressley Ridgill, Virginia Salt, Kim Saunders, Jack Stancil, Conrad Sturges III, John Sutherland, Elizabeth Thompson, Lynn Tierney, Joseph Towell, Neil Underwood, William Wagner, Rose Washofsky, Mark Williamson, Edward Willingham, William Woodard, Christopher Wright, and Diana Preston

Summary: Representatives of the North Carolina 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. In particular, several association members said that the joint notice of proposed rulemaking on minimum capital requirements (Docket No. R-1442) would prove unnecessarily burdensome for community banks. Concerns noted by association members about the proposal included the elimination of trust preferred securities from inclusion in additional tier 1 capital and increased risk-based capital charges for certain types of mortgages. Some association members said that many community banks would not be able to meet the proposed effective date for the provisions applicable to them. Association members also expressed broader concerns about the proposal, including negative effects on lending and competition, and resulting industry consolidation.