Meeting Between Federal Reserve Board Staff and Representatives of The Clearing House February 19, 2015

Participants: Scott Alvarez, Mark Van Der Weide, Anna Lee Hewko, and Jordan Bleicher (Federal Reserve Board)

Jeremy Newell and David Wagner (The Clearing House); Rodgin Cohen and Andrea Tokheim (Sullivan and Cromwell); Patrick Parkinson (Promontory Financial Group)

Summary: Staff of the Federal Reserve Board met with representatives of The Clearing House and its members to discuss the Board's proposed risk-based capital surcharge for U.S. G-SIBs ("the proposal"). The Clearing House representatives raised questions about the overall calibration of the proposal, and about the proposal's short-term wholesale funding metric. In response, Board staff indicated that the proposal is designed to equate the potential adverse impact on financial stability from the failure of a U.S. G-SIB with that of a large, but not systemic, banking organization. With respect to the short-term wholesale fund metric, Board staff explained that the metric is intended to reflect the financial stability risks from different types of short-term wholesale funding liabilities, and therefore considers both the residual maturity of such liabilities as well as the nature of any collateral securing those liabilities.