

**Meeting Between Governor Kugler and Staff of the Federal Reserve Board and
Representatives of Americans for Financial Reform
January 10, 2024**

Participants: Governor Adriana D. Kugler and Kelley O'Mara (Federal Reserve Board)

Lisa Donner, Renita Marcellin, Alexa Philo, and Alex Martin (Americans for
Financial Reform)

Summary: Governor Kugler and staff of the Federal Reserve Board met with representatives of Americans for Financial Reform (AFR) to discuss AFR's views on the agencies' Basel III endgame notice of proposed rulemaking (Basel III endgame proposal). AFR expressed general support for the Basel III endgame proposal, and particular support for the proposal's capital treatment related to market and operational risks. AFR also expressed particular support for requiring Category III and IV firms to recognize unrealized losses for purposes of determining capital requirements. AFR shared a view that that the Basel III endgame proposal should be finalized largely as proposed, although some changes may be appropriate to portions of the rule dealing with housing and climate finance. AFR also expressed skepticism of many common critiques of the rule.