

**Meeting Between Staff of the Federal Deposit Insurance Corporation, the Office of the
Comptroller of the Currency, the Federal Reserve Board and Representatives from
Barclays US LLC and Davis Polk & Wardwell LLP**

December 4, 2025

Participants:

Benedetto Bosco, Iris Li, Olga Lionakis, Joanne Rose, Michael Overmyer, Catherine Wood, and Kevin Zhao (Federal Deposit Insurance Corporation).

Margot Schwadron, Ankit Shah, Benjamin Pegg, and Diana Wei (Office of the Comptroller of the Currency)

Robin Oh, Anna Hewko, Andrew Willis, Mark Buresh, Abigail Roberts, Emily Davine, and Gillian Burgess (Federal Reserve Board)

Noah Cuttler, Richard.Kurdziel, Adrian Stoll, Jiri Chaloupka, Juli Smith, and David Winecoff (Barclays US LLC).

Luigi De Ghenghi and Andrew Rohrkemper (Davis Polk & Wardwell LLP)

Summary: Staff of the Federal Deposit Insurance Corporation, the Office of the Comptroller of the Currency and the Federal Reserve Board met with representatives from Barclays US LLC (Barclays) and Davis Polk & Wardwell LLP, regarding the Notice of Proposed Rulemaking on Regulatory Capital Rule: Large Banking Organizations and Banking Organizations With Significant Trading Activity (FDIC RIN 3064–AF29) (the “NPR”), which was published in the Federal Register on September 18, 2023 (88 FR 64028). The participants discussed technical recommendations regarding the regulatory capital treatment of certain traditional securitization structures, including the definition of early amortization provision. Barclays US LLC provided a confidential document to the agencies for which they seek confidential treatment under the Freedom of Information Act.