



**FDIC**

**Federal Deposit Insurance Corporation**  
550 17th Street, NW, Washington, DC 20429

Division of Depositor and Consumer Protection

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To: Public Comment File – RIN3064 – AE03 (FDIC)  
(Loans in Areas Having Special Flood Hazards; Proposed Rule)

Date: July 25, 2014

Subject: Phone call with American Bankers Association (ABA) Staff

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On July 7, 2014, staff from the FDIC’s legal and consumer protection divisions participated in a conference call regarding the proposed flood insurance rule with staff from the ABA. During the call, ABA staff provided information about their comment letter for the “safe harbor” provision in the proposed rule.

The ABA staff reiterated its preference for a safe harbor as described in its original comment letter. The ABA also discussed thoughts about reviews of private flood insurance policies by state insurance regulators. Finally, the call included a discussion of possible alternative approaches for a safe harbor.