

MEMO

TO: Executive Secretary
FROM: Dena Kessler
Counsel, Legal Division, Complex Financial Institutions Section
DATE: May 15, 2024
RE: Meeting at the Request of the Institute of International Bankers to Discuss the Proposed Guidance Document for Foreign Triennial Full Filers

Please include this memorandum in the public file relating to the Guidance for Resolution Plan Submissions of Foreign Triennial Full Filers (RIN 3064-ZA38), 88 Fed. Reg. 64641.

On May 7, 2024, staff from the Federal Deposit Insurance Corporation (“**FDIC**”) participated in a meeting with staff from the International Institute of Bankers (“**IIB**”) to discuss the *Guidance for Resolution Plan Submissions of Foreign Triennial Full Filers*, 88 Fed. Reg. 64641 (“**Proposed FBO Guidance**”). IIB representatives discussed topics raised in IIB’s November 30, 2023 comment letter addressing the Proposed FBO Guidance, including: (1) the scope of firms that would be subject to the Proposed FBO Guidance; (2) expectations regarding certain capital and liquidity capabilities; (3) consequences of a firm’s global resolution plan on its U.S. operations, and certain connections between a firm’s global resolution plan and its U.S. resolution plan; (4) information about certain material entities; and (4) the deadline for firms’ next resolution plan submissions.

Representatives from IIB also discussed connections between the Proposed FBO Guidance and pending rulemakings, and lessons learned from the resolution of certain financial institutions in 2023.

FDIC staff expressed their intent to consider the issues raised during the meeting.

A list of participants appears below:

FDIC: Jason Ahrenholtz, Robert Connors, Mark Haley, Dena Kessler, Celia Van Gorder

IIB: Stephanie Webster, Beth Zorc