

MEMORANDUM

To: Public Comment File – Docket No. OCC–2023–0008

From: Carl Kaminski, Assistant Director, Bank Advisory Group, Chief Counsel's Office

Date: June 5, 2024

Subject: Meeting with representatives from Banco Santander to discuss: Notice of Proposed Rulemaking: "Regulatory Capital Rule: Large Banking Organizations and Banking Organizations with Significant Trading Activity"

Staff of the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, and the Federal Reserve System met with representatives from Banco Santander regarding the agency's Notice of Proposed Rulemaking on Regulatory Capital Rule: Large Banking Organizations and Banking Organizations With Significant Trading Activity (the "NPR"), which was published in the Federal Register on September 18, 2023 (88 FR 64028).

The Banco Santander representatives discussed the proposed defaulted exposure definition and its impact on auto loan term extensions.

Attendees

OCC	Diana Wei	
	Benjamin Pegg	
	Andrew Tschirhart	
	Venus Fan	
	Mariya Komartsova	
	Carl Kaminski	

FDIC Iris Li

Catherine Wood Anjoly David Ernest Barkett Michael Maloney Merritt Pardini Keith Bergstresser Peter Yen Richard Smith

Brian Cox Olga Lionakis

David Riley Huiyang Zhou

	1101, 1118 21100	
Federal Reserve Board	Christopher Appel David Alexander Katarina Liviana Matthew McQueeney Ryan Rossner Jasmin Keskinen Gillian Burgess Andrew Willis	
Banco Santander	Bart Simon Brian Yoshida Thulasiram Kesavan RL Prasad Timothy Sweeney Jesse Villarreal	