

THE FINANCIAL SERVICES ROUNDTABLE



Financing America's Economy

To: Representatives of the Financial Services Roundtable, GAC, Public Affairs, All Staff, Research Working Group

Fast Facts: 4th Quarter Regulatory Outlook

FACT: According to [Davis Polk's Dodd-Frank Progress Report](#), 122 rule deadlines were missed in the 3rd quarter, and 37 new rules are due to be finalized in 4th quarter.

FACT: Thus, [over 150 rules potentially could be finalized](#) between October-December 2011. This amount of rulemaking is unparalleled to any other quarter since Dodd-Frank was passed.

FACT: Three tranches of rules to expect are:

1. Already proposed rules and guidance awaiting finalization;

- This includes capital planning, FDIC assessment reporting for sub-prime loans and leveraged loans, stress testing standards, and the Volcker Rule.

2. Rules from Sections 165 and 166 of the Dodd-Frank Act, and;

- These rules will be issued by the Federal Reserve and apply to bank holding companies over \$50 billion and nonbanks designated by the Financial Stability Oversight Committee.
- The package of rules is expected to be over 1,000 pages long, containing requirements for risk-based capital; leverage; liquidity; overall risk management; concentration limits; risk committees, and; Federal Reserve directed stress testing and recovery planning.

3. Basel III capital and liquidity requirements.

- On November 3-4, 2011, the G-20 Leader's Summit will meet in Cannes, France to discuss Basel III requirements. The Basel III requirements are detailed [here](#).

For more information regarding Dodd-Frank rulemaking and what to expect during the fourth quarter, please contact Don Truslow, President of the Financial Stability Industry Council, at don@fsround.org.

As always, please do not hesitate to contact Abby McCloskey, Director of Research at the Financial Services Roundtable, at abbyresearch@fsround.org, or Scott Talbott, Senior Vice President of Government Affairs, at scott@fsround.org.