



October 2009 - INTERSTATE CAPITOL COMMENTS

Community Bankers Association of Kansas

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Community Bankers Education & Social Event

All Bankers Are Invited to Attend!

CBA is hosting another great opportunity to network with community bankers and gain valuable information.

Join fellow community bankers in Salina or Topeka to get the latest information on current examination issues and learn what will be on the 2010 Legislative agenda.

(To access a blue underlined hyperlink, place your cursor on the link, use Ctrl + Click and the page will open.)

FDIC proposes prepaid assessment

At their September 29 meeting, the FDIC voted unanimously to propose a plan that would require banks to prepay, on December 30, 2009, assessments for the fourth quarter of 2009 and for 2010, 2011 and 2012. The FDIC estimates that the proposal would raise about \$45 billion. After the board meeting, FDIC Chairman Sheila Bair and members of her staff held a telephone conference providing additional information and answers to bankers' questions. (You can listen to a recording of the teleconference until the end of October call by calling 1-866-372-3813.)

On September 29, OCC Comptroller Dugan commented this that one downside to this prepayment is that it could reduce funds available for lending. Of course, the counter to the Comptroller's observation is that the industry is allegedly awash in liquidity. (See link to News Release 2009-117, below.)

For the fourth quarter of 2009 and for all of 2010, the prepaid assessment rate would be based on each institution's total base assessment rate for the third quarter of 2009, modified to assume that the assessment rate in effect for the institution on September 30, 2009, had been in effect for the entire third quarter of 2009. The prepaid assessment rate for 2011 and 2012 would be equal to that institution's modified third quarter 2009 total base assessment rate plus 3 basis points. Each institution's prepaid assessment base would be calculated using its third quarter 2009 assessment base, adjusted quarterly for an estimated 5 percent annual growth rate in the assessment base through the end of 2012.

The entire amount of its prepaid assessment would be recorded as a prepaid expense (asset) as of December 30, 2009. As of December 31, 2009, and each quarter thereafter, each institution would record an expense (charge to earnings) for its regular quarterly assessment for the quarter and an offsetting credit to the prepaid assessment until the asset is exhausted. Once the asset is exhausted, the institution would record an accrued expense payable each quarter for the assessment payment, which would be paid in arrears to the FDIC at the end of the following quarter. If the prepaid assessment is not exhausted by December 30, 2014, any remaining amount would be returned to the depository institution.

Prepaid assessments would be mandatory for all institutions, but the FDIC would exercise its discretion as supervisor and insurer to exempt an institution from the prepayment requirement if the FDIC determines that the prepayment would adversely affect the safety and soundness of the institution. In addition, institutions could request exemption from payment under certain circumstances. The FDIC believes that any such requests would be confidential. The FDIC would begin to offset prepaid assessments on

Talk with the Kansas State Bank Commissioner, Tom Thull and Assistant Regional Directors, Steve Gaddie, and John Jilovec, with the FDIC. Also joining the social is IT professional, Robert Mendez, with BankOnIT, he will discuss some of the changes, risks and the competition as it relates to technology for your bank.

Locations and Times:

Tuesday

November 17, 2009

Salina Country Club
2101 Country Club Road
Salina, KS



Wednesday

November 18, 2009

Shawnee Country Club
913 SE 29th Street
Topeka, KS

We look forward to seeing you at the meetings. Don't forget to invite another banker to join you and other community bankers for this informative meeting.

3 Easy Ways to RSVP

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March 30, 2010, representing payment for the fourth quarter of 2009.

Comments must be received on or before October 28, 2009.

During the teleconference, Chairman Bair was asked to address the reasons the FDIC did not opt for bond issuance that was suggested by some community bankers. The FDIC's reasons for rejecting this include:

- The FDIC likes the idea of using the assessment system because it has been in place and has worked for so long.
- When borrowing from the industry, it is difficult to know how much will be raised.
- An infrastructure would have to be put in place to issue bonds.
- A prepaid assessment doesn't count against the debt limit.

Another option that was discussed during the teleconference was the tapping of the FDIC's \$100 billion line of credit with the Treasury Department. Chairman Bair said that the Treasury line of credit is for unexpected losses, not for losses that are expected and planned for. Additionally, the Chairman said that tapping into the Treasury line of credit could be portrayed publicly as another bank subsidy—an appearance that needs to be avoided.

Related links:

[Notice of Proposed Rulemakingⁱ](#)

[FDIC Press Releaseⁱⁱ](#)

[Comptroller Dugan Comments on Prepaid FDIC Assessment \(NR 2009-117\)ⁱⁱⁱ](#)

Comment:

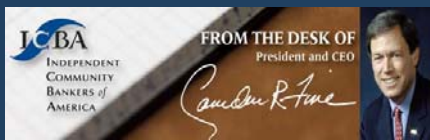
- *The FDIC considered discounting the prepaid assessments, but FDIC accountants said that it would make the assessments look less like a prepayment and more like a loan, and, thus, would endanger its expense status for accounting rules.*
- *The proposal will not restrict lending or stress balance sheets. On CALL reports this will be treated as quarterly assessment and will be confidential. TAGP payments will not be handled in the prepayment and will continue to be quarterly. A calculator is on the FDIC's Web site to help banks determine their assessment.*
- *This did not affect the September 30, 2009, special assessment.*
- *The prepaid assessment is a transferable asset.*
- *When a bank fails, the remaining amounts of the prepaid assessment will go to the receivership estate.*
- *If a bank's actual growth is higher than what is paid, it will pay additional assessments. If lower, it will receive a refund.*
- *When asked if repayment or profits from the TARP funds could be used to fund the DIF, Chairman Bair said that it was Treasury's call, but that funding the DIF was not within the parameters of the program.*

The FDIC is seeking answers to Sub S accounting treatment. Under current rules, Sub S banks are only permitted to take deductions one year in advance. Absent a special ruling by the FDIC, Sub S banks would be permitted to deduct assessments for 2009 and 2010, but assessments for 2011 and 2012 would not be deductible.

According to Executive Director Bruce Toppin, III, the [Subchapter S Bank Association^{iv}](#) is planning to file a comment on the FDIC's proposed rule making in hopes that the FDIC and Treasury will work to adopt a plan that provides for more favorable tax treatment of the assessments.

FDIC: Foreclosure prevention for consumers

The FDIC is launching a [foreclosure prevention^v](#) initiative to help consumers and the banking industry avoid unnecessary foreclosures and stop foreclosure "rescue" scams that promise false hope to consumers at risk of losing their homes. This initiative includes outreach, referral services, and an information [tool kit^{vi}](#). ([FIL-54-2009](#))



Fine Points

By Camden R. Fine
President and CEO of ICBA

Shark in the Waters

The sea changes proposed under the financial reform effort in Washington are likely to leave no segment of our financial system untouched. ICBA is focused solely on ensuring that community banks are not harmed while unregulated nonbanks and too-big-to-fail Wall Street financial firms are brought under control. So far community banks and ICBA have achieved considerable progress in reshaping the proposals that matter most to Main Street America.

We've won early support in Congress and with the administration to impose higher capital and regulatory premiums on systemically dangerous institutions and to keep the proposed Consumer Financial Protection Agency out of your pockets, out of your banks and away from your coffee machines. Thanks to the efforts of thousands of community bankers, we have tremendous credibility and clout with members of Congress as recent statements by congressional leaders attest.

But we have much more work to do before ICBA can support any financial reform bill, and our progress could be undermined. One danger, like a shark fin gliding ominously above the ocean's surface, remains the misguided notion of creating a single federal bank regulator.

House Financial Services
Committee Chairman Barney Frank

Comment: This is good information to put into the hands of your mortgage customers. Raising consumers' awareness of foreclosure "rescue" scams will give borrowers more confidence in knowing they are working with legitimate counselors and servicers to obtain a loan modification that could help them avoid foreclosure.

OCC: Community Bank Director Workshops

The OCC has twenty-five workshops for community bank directors in 16 locations. The next workshops are in Atlanta, GA, on October 20 and 21 and in St. Louis, MO, on November 2-4. On several dates, workshops occur on consecutive days for those who want to take advantage of two or more workshops. "A New Director's Challenge: Mastering the Basics," is offered in five different locations. This workshop is geared primarily to national bank directors with fewer than three years of experience or longer tenured directors who would like to review the fundamental requirements of their position. For all workshops, enrollment is limited to 50 participants. You may register [online](#)^{vii} or print the online registration form and fax it to (336) 644-6205. If you have any questions about the workshops, please contact the registration center at 336-451-0557 or by emailing regcenter@cmpmeetings.com.

Reg. Z amendment proposed for protection of credit card users

In December 2008, the Federal Reserve adopted final regulations prohibiting unfair credit card practices and improving the disclosures consumers receive in connection with credit card accounts. On September 29, 2009, the Fed proposed amendments to Reg. Z to protect consumers who use credit cards from a number of potentially costly practices. If adopted, the proposal would amend aspects of those regulations to incorporate provisions of the Credit Card Accountability Responsibility and Disclosure Act of 2009 (Credit Card Act), which was enacted in May 2009. The proposed rule represents the second stage of the Federal Reserve's implementation of the Credit Card Act.

Among other things, the proposed rule would:

- Protect consumers from unexpected increases in credit card interest rates by generally prohibiting increases in a rate during the first year after an account is opened and increases in a rate that applies to an existing credit card balance.
- Prohibit creditors from issuing a credit card to a consumer who is under the age of 21 unless the consumer has the ability to make the required payments or obtains the signature of a parent or other cosigner with the ability to do so.
- Require creditors to obtain a consumer's consent before charging fees for transactions that exceed the credit limit.
- Limit the high fees associated with subprime credit cards.
- Ban creditors from using the "two-cycle" billing method to impose interest charges.
- Prohibit creditors from allocating payments in ways that maximize interest charges.

Here is a [link to the notice](#)^{viii} that will be published in the Federal Register. Comments on the proposal must be submitted within 30 days after publication in the Federal Register, which is expected shortly.

Comment: The remaining provisions of the Credit Card Act go into effect on August 22, 2010 and will be implemented by the Federal Reserve at a later date.

OTS issues revised TILA open-end credit examination procedures

This set of revisions to the OTS TILA examination procedures incorporates the changes to Regulation Z that are covered in the interim final rule. The procedures will examine whether savings associations:

- Have reasonable procedures to ensure that periodic statements are mailed or delivered at least 21 days prior to the payment due date and the date on which any grace period expires (includes HELOCs);
- Provide written notice of significant changes in account terms (such as an APR increase, fees for available credit, grace period, or over limit fees), an increase in the required minimum periodic payment, or a rate increase due to delinquency or

(D-Mass.) said last month that a single federal regulator, discredited by monolithic regulatory systems in Great Britain and Japan, has “no remote chance” of passing the Congress. Nevertheless, the idea, along with consolidating banking charters, is particularly alive with some key members of the Senate Banking Committee, including Chairman Christopher Dodd (D-Conn.).

Those senators think the financial crisis stemmed from too-big-to-regulate megabanks’ receiving lenient regulatory treatment. They believe the megabanks played agencies against each other, which they call “regulatory arbitrage.” They say an all-powerful single regulator will stand up to the megabanks. But they’re gravely mistaken—a mistake that could be fatal to community banks and the dual banking system.

Creating a single regulator would tinker with parts of the financial system that had no role in causing the crisis. Our current diversified regulatory system has allowed a diversified financial system where community banks have thrived. In fact, the crisis largely stemmed from the lack of rigorous regulation of nonbank financial firms operating outside the regulatory system. The large Wall Street financial firms involved in reckless behaviors or consumer abuses did so through unregulated or significantly less-regulated subsidiaries.

However well-intentioned, lawmakers considering a single regulator have the diagnosis and the remedy almost exactly backward. Rather than regulating the unregulated and preserving a system that promotes financial choice and diversity, their prescription would fuel further concentration and create even bigger megabanks.

Community banks would be an afterthought to such an all-powerful, single-focused agency. They would be trapped in a one-size-fits-all regulatory system deaf to their

default or as a penalty, 45 days before the effective date of the change or increase; and

- Include in the notice a description of the changes and their effective date. Except for an increase in the required minimum periodic payment, also include in the notice a statement that the consumer has the right to reject the changes prior to the effective date (unless the consumer fails to make the minimum payment for 60 days after the due date); instructions for rejecting the changes; and a statement, if applicable, that if the consumer rejects the changes, the consumer’s ability to use the account will be suspended.

2009 CRA & HMDA Data

The free FFIEC CRA and HMDA Data Entry Software, version 2009 for Calendar Year 2009 data due March 1, 2010, is only available by download from the [FFIEC](#)^{ix} CRA and HMDA web sites.

Reimbursement rates for providing financial records to government authorities under RFPA

The Fed approved [amendments to Subpart A of Regulation S](#),^x which implements the requirement under the Right to Financial Privacy Act (RFPA) that the Board establish the rates and conditions under which payment shall be made by a government authority to a financial institution for assembling or providing financial records pursuant to RFPA. These proposed amendments update the fees to be charged and takes account of recent advances in electronic document productions. Effective Date: January 1, 2010.

Reimbursement Schedule:

Reproduction:

- Photocopy, per page \$0.25
- Paper copies of microfiche, 0.25 per frame.
- Duplicate Microfiche, per 0.50 microfiche.
- Storage media Actual cost.

Search and Processing:

- Clerical/Technical, hourly 22.00 rate.
- Computer Support Specialist, 30.00 hourly rate.
- Manager/Supervisory, 30.00 hourly rate.

VISA encryption best practices for merchants

Data field encryption protects card information from the swipe to the acquirer processor with no need for the merchant to process or transmit card data in the “clear.”

Importantly, data field encryption renders cardholder data useless to criminals in the event of a merchant data breach. Industry standards are still in the development phase.

VISA’s [best practices](#)^{xi} are designed to achieve five implementation objectives:

- Limit clear text availability of cardholder data and sensitive authentication data to the point of encryption and the point of decryption.
- Use robust key management solutions consistent with international and/or regional standards.
- Use key-lengths and cryptographic algorithms consistent with international and/or regional standards.
- Protect devices used to perform cryptographic operations against physical/logical compromises.
- Use an alternate account or transaction identifier for business processes that requires the primary account number to be utilized after authorization, such as processing of recurring payments, customer loyalty programs or fraud management.

PUBLICATIONS, REPORTS, STUDIES, TESTIMONY & SPEECHES

- **Fed’s Bank Holding Company Supervision Manual updated**

The Fed’s [Bank Holding Company Supervision Manual](#)^{xii} is updated semiannually. The last update was July 2009.

practical needs and concerns. And if the federal regulators are combined, consolidating the dual state and federal banking system would not be far behind. That would lead to a hostile, and unworkable, operating environment for community banks and a catastrophe for Main Street America.

As ICBA Independent Banker goes to press, we expect single-regulator legislation to be introduced. Join ICBA and let's fight it off.

Camden R. Fine is president and CEO of ICBA. Reach him at cam.fine@icba.org.

From the Top

By R. Michael S. Menzies Sr.

Technology to Live By

The public thinks banking is all about money. We community bankers think of it more in terms of relationships. At its basis, though, banking—anywhere, everywhere—is about technology. After the handshake, everything we do from processing payments to researching viability of loans to securing data depends on technology.

Do you understand all the intricacies of the technology your job and livelihood depend on? Probably not, unless you're in the IT department. But you do need to understand the basics—starting with how crucial it is to invest in the best systems and people out there.

Take the 2009 ICBA Community Bank Payments Survey, for example. It shows that in the past two years, 52 percent of community bank respondents increased payments-related spending. No surprise: 62 percent now offer merchant remote deposit capture (up 41 percent since 2007); 87 percent offer consumer online bill payment; and 91 percent have had to reissue debit cards because of fraud.

- **OTS: Revised Examination Handbook Section 214, Other Commercial Lending**

The OTS revised Examination Handbook Section 214, Other Commercial Lending. ([RB 37-45](#)^{xiii}) Here is a summary of the changes:

- Regulatory Limits: Describes investment limitations for savings associations and updates the definition of small business lending.
- Types of Commercial Lending: Discusses the various types of commercial loans, including start-up and business acquisition loans, leveraged lending, working capital and seasonal loans, term business loans, asset based lending, floor plan loans, secured versus unsecured lending, combination loans, and agricultural lending.
- Credit Risk: Discusses the need for sound underwriting standards, an efficient and balanced loan approval process, and a competent lending staff in the management of credit risk.
- Loan Portfolio Management: Discusses the importance of managing portfolios as a whole and assessing how the risks of individual loans and portfolios are interrelated.
- Loan Approval Process and Underwriting: Deletes the 5 “Cs” of credit discussion as it was moved to Examination Handbook Section 201.
- Risk Management: Discusses the need for robust risk management of commercial lending activities, including sound policies and procedures, underwriting, and documentation, as well as managing concentration risk.
- Managing Credit Concentration Risk: Defines credit risk concentration and the need for savings associations to maintain effective internal policies, systems, and controls to identify, measure, monitor, and control their credit risk concentrations.
- Safe and Sound Administrative Procedures: Revises loan administration procedures needed for safe and sound commercial lending.

- **OTS: Revised Examination Handbook Section 1215, HMDA**

OTS is issued [revised Examination Handbook Section 1215, Home Mortgage Disclosure Act](#)^{xiv} to address changes to the requirements for reporting price information on higher-priced loans as a result of amendments to HMDA. Change bars in the margins of the handbook section indicate revisions to content.

The updated procedures (developed on an interagency basis) require savings associations to:

- Establish policies and procedures to address the collection of the rate spread (difference between the annual percentage rate (APR) and the average prime offer rate for a comparable transaction as of the date the interest rate is set);
- Report rate spreads between the APRs and the average prime offer rates for comparable transactions as of the date the interest rates are set, if the spreads are equal to or greater than 1.5 percentage points for first-lien loans, or equal to or greater than 3.5 percentage points for subordinate-lien loans; and
- Continue to have a system for tracking rate lock dates and rate spread calculations.

- **FinCen: The SAR Activity Review, Trends, Tips & Issues**

In the Trends and Analysis section of [this issue](#)^{xv}, FinCEN's Office of Regulatory Analysis provides new information on mortgage loan fraud SARs filings for the first six months of 2009. In this section is also a profile of FinCEN's E-Filing system, looking at the trends and benefits of the system. An analysis of calls received on FinCEN's Regulatory Helpline shows trends during the period of July 1, 2008 to June 30, 2009. Structuring is the focus of many of the law enforcement cases in this issue, and the Issues and Guidance section offers articles on preparing and filing SARs and avoiding common SAR errors. Finally, the Industry Forum explores how the auditing of AML programs has evolved since the topic was first addressed in [Issue 6](#)^{xvi} of The SAR Activity Review.

Alternative payment systems from PayPal to Google threaten the traditional banking model. A payment scam almost put one community bank out of business. Customers are wary that their private financial information will fall into the wrong hands. Crooks around the globe are trying our security systems for weakness.

With all this going on, it's tempting for us community bankers to want to hide under the desk. Instead, we should seize the opportunities inherent in any challenge. For retail customers alarmed by the bad guys, we can prove ourselves the good guys with protection and strength. For small businesses, we can deliver effectiveness and efficiency in the form of tools such as remote deposit capture (more on this in a future issue). To all customers, we can offer robust and secure online banking services. And we can streamline and upgrade our own systems to be more useful, more responsive and more profitable.

No, not "can"—"must." Technology is no longer about trying to be on the cutting edge or even about being ahead of the competition. It's about service, the commodity we live and die by. And by extension, it's about survival.

Are you promoting—not just offering—electronic business-to-business payments? Are you investing in top-of-the-line security and testing it constantly? Are you training your whole staff in technology issues? Is your IT chief active in the user group of your main technology vendor? Are you investing in hiring the very best people, then sending them to certification classes and conferences?

Sure, we can ignore and fight off what we don't understand. We can also lose money, market share, growth potential and customers—who are often ahead of us in demand for and use of technology.

Comment: Observations for consideration when preparing SARs begins on page 46. Suggestions include: beginning with a summary, make note of the supporting documents, indicate if employees have personal knowledge, include identifiers for parties only identified in the narrative, select multiple violation types when appropriate, and select OTHER when no other box applies and describe the other activity.

- **Federal Reserve publishes latest FedFocus**

The latest [FedFocus](#) keeps you informed about hot topics in the industry, as well as provides insight into the value of Federal Reserve Financial Services.

Important upcoming compliance dates:

With all the regulatory changes coming up in the next few months, we thought a calendar would be helpful. Beginning in October, an updated compliance calendar will appear at the end of each issue of Capitol Comments.

- 11.02.2009 Last day for TAG participants to opt out of extension of TAG program. For instructions, click [here](#).^{xvii}
- 12.01.2009 [Reg. GG \(Unlawful Internet Gambling Act\)](#)^{xviii} – Must send required notice to existing customers. Must perform due diligence at account opening and have procedures for dealing with violations.
- 01.01.2010 [Reg. X \(RESPA\)](#)^{xix} – GFE and HUD-1 both change. Fee variance between GFE and HUD-1 limited based on fee type. Except with change of circumstances and new disclosures (within 3 business days of change), lender is locked into the fees originally disclosed for 10 business days after such disclosure.
- 01.01.2010 [Reg. DD \(Truth-in-Savings\)](#)^{xx} – Disclose overdraft fees for statement period and YTD on periodic statements. Balances on automated systems (e.g. ATMs) must not include overdraft protection amount.
- 01.01.2010 Effective date of TAG participant opt-out
- 03.31.2010 [TALF program expires](#).^{xxi}
- 04.01.2010 [Reg. Z](#)^{xxii} – Escrow on higher priced loans (Specifically, [12 CFR 226.35\(b\)\(3\)](#)^{xxiii} is effective April 1, 2010.)
- 07.01.2010 [Reg. Z](#)^{xxiv} – Changes to open end credit early disclosures, periodic statements, more advance notice of change in terms, and increased advertising disclosures.
- 06.30.2010 TAG program expires.
- 07.01.2010 [Reg. AA \(Unfair or Deceptive Practices\)](#)^{xxv} – A lender may not consider a credit card payment late unless statement is provided 21 days prior to due date. Requirements on how credit cards payments above minimum are allocated. Restriction on when credit card rates may change. Finance charges on previous billing cycles limited. Security deposits and fees limited.
- 12.31.2013 [FDIC deposit insurance](#)^{xxvi} temporary limit increase to \$250,000 expires.

Compliance dates from the not-so-distant past:

- 10.01.2009 [Reg. C \(HMDA\)](#)^{xxvii} – Loans requiring a rate spread must use Reg. Z's new higher priced loan definition.
- 10.01.2009 [Reg. Z \(TIL\)](#)^{xxviii} – Higher priced mortgage loan consumer protections; prohibits appraiser influence; prohibits unfair/deceptive servicing standards on dwelling secured closed end loans; advertising rules open & closed end loans; changes on HOEPA loan criteria.
- 09.18.2009 [New International ACH Transaction \(IAT\) rule](#)^{xxix} requiring all international ACH payments to be uniquely identified.
- 07.02.2009 [Reg. D \(Reserve Requirements of Depository Institutions\)](#)^{xxx} Authorizes

Technology and the payments systems are as important as credit, deposit taking, board governance, and risk management; they will both lead and drive our industry for the foreseeable future. Meet with your IT team today, and make plans together to thrive.

R. Michael S. Menzies Sr. is ICBA chairman and the president and CEO of Easton Bank and Trust Co. in Easton, Md.

Online Help

Use financial regulatory reform lobbying resources at ICBA's Grassroots Advocacy Center; see icba.org.

Fed member banks of to enter into pass-through arrangements. Previously, member banks were statutorily prohibited from passing required reserve balances through a correspondent institution. Eliminates the provision in Regulation D's definition of "savings deposit" that limits certain kinds of transfers from savings deposits to not more than three per month. As a result, all transfers and withdrawals from a savings deposit that are subject to a monthly limit are subject to the same limit of not more than six per month.

07.02.2009

[Reg. D^{xxx}](#) – directs Federal Reserve Banks to pay interest on certain balances held at FR Banks by or on behalf of certain depository institutions. Authorizes the establishment of limited purpose accounts, called "excess balance accounts," at FR Banks for the maintenance of excess balances of eligible institutions. These excess balance accounts are intended to permit eligible institutions to earn interest on their excess balances without significantly disrupting established business relationships with their correspondents.

Comment: Distribute these calendars to your CEO, CFO, Compliance Officer, and Operations Officer.

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<http://www.fdic.gov/regulations/laws/federal/2009/09proposeAD49.pdf>

ⁱ <http://www.fdic.gov/news/news/press/2009/pr09178.html>

ⁱ <http://www.occ.gov/ftp/release/2009-117.htm>

ⁱ <http://www.subsbanks.org>

ⁱ <http://www.fdic.gov/consumers/loans/prevention/index.html>

ⁱ <http://www.fdic.gov/consumers/loans/prevention/toolkit.html>

ⁱ <https://cfd117.cfdynamics.com/secure/cmp-occ/>

ⁱ <http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20090929a1.pdf>

ⁱ <http://www.ffiic.gov/software/>

ⁱ <http://www.bankersonline.com/topstory/74fedreg/74FR50105.pdf>

ⁱ http://corporate.visa.com/_media/best-practices.pdf

ⁱ http://www.federalreserve.gov/boarddocs/supmanual/supervision_bhc.htm

ⁱ <http://files.ots.treas.gov/74862.pdf>

ⁱ <http://files.ots.treas.gov/422224.pdf>

ⁱ http://www.fincen.gov/news_room/rp/files/sar_tti_16.pdf

ⁱ http://www.fincen.gov/news_room/rp/files/sar_tti_06.pdf

ⁱ <http://www.fdic.gov/news/news/financial/2009/fil09048.html>

ⁱ<http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20081112a1.pdf>

ⁱ<http://www.hud.gov/offices/hsg/ramh/res/finalrule.pdf>

ⁱ<http://edocket.access.gpo.gov/2009/pdf/E8-31183.pdf>

ⁱ<http://www.federalreserve.gov/monetarypolicy/20090817a.htm>

ⁱ<http://edocket.access.gpo.gov/2008/pdf/E8-16500.pdf>

ⁱ<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr;sid=54084c95801c7a737f1e9482f547274f;rgn=div2;view=text;node=20080730%3A1.19;idno=12;cc=ecfr;start=1;size=25>

ⁱ<http://edocket.access.gpo.gov/2009/pdf/E8-31185.pdf>

ⁱ<http://edocket.access.gpo.gov/2009/pdf/E8-31186.pdf>

ⁱ<http://www.fdic.gov/deposit/deposits/difactsheet.html>

ⁱ<http://edocket.access.gpo.gov/2008/pdf/E8-25320.pdf>

ⁱ<http://www.federalreserve.gov/boarddocs/meetings/2008/20080714/draftfedreg.pdf>

ⁱhttp://www.nacha.org/IAT_Industry_information/

ⁱ<http://edocket.access.gpo.gov/2009/E9-12431.htm>

ⁱ<http://edocket.access.gpo.gov/2009/pdf/E9-12432.pdf>