MEMORANDUM

TO: File No. S7-07-16

FROM: Kevin Schopp

Special Counsel

Division of Trading and Markets

U.S. Securities and Exchange Commission

DATE: November 9, 2016

RE: Meeting with Representatives of Zions Bancorporation

On November 9, 2016, staff from the Office of the Comptroller of the Currency (OCC), the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the Federal Housing Finance Agency (FHFA), and the Securities and Exchange Commission (SEC) met with representatives from Zions Bancorporation (Zions). The representatives shared Zions's views on the proposed Incentive-Based Compensation Arrangements rule. Specifically, they discussed the scope of employees covered by the proposed rule, deferral under the proposed rule, and the relative compensation and exposure tests of the significant risk taker definition.

Participants	

FDIC Rosalind Bennett

Annmarie Boyd

Corri Mattison

George Parkerson

FHFA Mary Pat Fox

Lindsay Simmons

FRB Meg Donovan

Joe Maldonado

Alyssa O'Connor

Teresa Scott

Michael Solomon

OCC	Debra Peery
	Marta Stewart-Bates
SEC	George Papadakis
	Kevin Schopp
Zions	Thomas Laursen
	Scott Law