

Comparison of the long-term debt proposal to the existing TLAC rule

September 5, 2023 | Client Update

The FDIC, Federal Reserve and OCC have proposed to extend the long-term debt and clean holding company portions of the Federal Reserve's existing TLAC Rule for U.S. GSIBs and U.S IHCs of foreign GSIBs to all large banking organizations with \$100 billion or more in total assets, with virtually no tailoring and only a few other amendments to the existing TLAC Rule. This client update compares the key provisions of the LTD Proposal to the Federal Reserve's existing TLAC Rule.

[Read the full update](#)

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

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