



Regulatory Life After GLB

Daniel K. Tarullo

Georgetown University Law Center

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Potential Legal/Supervisory Hurdles to Greater Use of GLB

- FRB as Umbrella Regulator
- Substantive Restrictions on BHCs/FHCs
 - Capital requirements
 - Limitation on non-financial affiliates
 - Restrictions on affiliate transactions (Reg W, privacy, etc.)
 - Special anti-tying restrictions



Industry GLB Wish Lists -- ABA

- Cross-marketing for non-financial companies owned by securities affiliate
- Revise SEC "push-out" rules
- Implement FHLB collateral provisions
- Let Fed/OCC exercise § (k)(1) authority
- Create optional federal charter for insurance



Industry GLB Wish Lists -- SIA

- Make grandfather clause for non-financial activities permanent and remove 15% cap
- Uniform national standards for customer privacy protection
- Uniform national standards for securities



Industry GLB Wish List – FSR

- Make grandfather clause for 15% non-financial activities permanent
- Eliminate activity restrictions on fin.subs
- Let Fed/OCC exercise § (k)(1) authority
- Create optional federal charter for insurance
- Uniform national standards for privacy, predatory lending