Attached is a Federal Financial Institutions Examination Council (FFIEC) Request for Public Comment on Recourse Arrangements. The FFIEC requests comment on the definition of "recourse" and the appropriate reporting and capital treatments that should be applied to recourse arrangements. The document also seeks comment on how recourse arrangements should be treated under the lending limits applicable to savings associations and banks.

The rescission of this Transmittal Letter does not address the status of the conveyed document. To determine the status of the conveyed document, please check with the original issuer of the document.

The five agencies represented on the Council — the Office of Thrift Supervision, the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, the Federal Reserve Board, and the National Credit Union Administration — are considering regulations that would address the capital treatment of recourse arrangements. Comments from the public will assist the agencies in developing comprehensive and uniform treatment of recourse arrangements. Comments are due August 28, 1990.

Director, Office of Thrift Supervision