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FEDERAL RESERVE BANK OF NEW YORK

NEW YORK, N. Y. 10045

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May 14, 1965

To the State Member Banks in the Second Federal Reserve District Subject to Regulation F:

On the reverse side of this letter is a copy of an interpretation, issued by the Board of Governors of the Federal Reserve System, of the definition of the term "officer" in section 206.2(o) of Regulation F. This interpretation will be published shortly in the Federal Register and Federal Reserve Bulletin, but it is being sent to you now so that you may have prompt notice of its content.

ALFRED HAYES,
President.

(Over)

FEDERAL RESERVE BANK OF NEW YORK

BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM

Interpretation of Definition of "Officer"
for Regulation F Purposes

Section 206.2(o) of Federal Reserve Regulation F defines the term "officer" to mean any person who occupies one or more of certain enumerated positions in a member State bank "and any other person who participates in major policy-making functions of the bank." Among the positions so enumerated is that of "Vice President", but it is also provided that a person bearing the title of "Vice President" who does not "participate in major policy-making functions of the bank" is not an officer for the purposes of Regulation F.

When Regulation F was adopted, an accompanying description in the Federal Register (30 F.R. 362; January 12, 1965) stated that "an 'officer' of a bank is defined to exclude persons who, regardless of title, do not participate in major policy-making functions." This statement has resulted in some confusion as to the scope of the definition of "officer". In order to clarify the matter, the Board of Governors has made the following interpretation.

All persons holding any position enumerated in section 206.2(o), except those holding a position as "Vice President", are officers for purposes of Regulation F regardless of whether they participate in major policy-making functions. The second sentence of section 206.2(o), which provides that certain persons are not officers if they do not participate in major policy-making functions, applies only to persons with the title of "Vice President".