

**Meeting between Federal Reserve Staff  
and Representatives of KeyCorp  
December 21, 2011**

**Participants:** Bill Blake, Jeff Weeden, Manuel Steffas and Thomas Stevens (KeyCorp)

Amy Berardinelli, Benjamin McDonough, Beverly Hirtle, Kevin Stiroh,  
Nadine Wallman and Tim Clark (Federal Reserve)

**Summary:** At the invitation of the Federal Reserve, representatives of KeyCorp met with representatives of the Federal Reserve to discuss the results of the Comprehensive Capital Analysis and Review (CCAR) that the Federal Reserve may publish. Representatives of the Federal Reserve indicated that the timing of publication of results, the scope of the results, and the level of detail that would be made available are still under consideration. Other topics of discussion included the implications to KeyCorp of publication of the results, including the market effects that disclosure may have on KeyCorp, and the relationship between the CCAR and the stress testing required under section 165(i) of the Dodd-Frank Wall Street Reform and Consumer Protection Act.