

PARENT HOLDING COMPANY		LTD REQUIREMENT FOR PARENT HOLDING COMPANY	LTD REQUIREMENT FOR IDI > \$100 BILLION (Covered IDI) (and any IDI affiliated with a Covered IDI)
Covered Entities	Category II, III or IV – BHC or SLHC (“Covered HC”)	A Covered HC would be required to issue eligible external LTD and LTD issued to an affiliate would not qualify.	An IDI subsidiary of a Covered HC would be required to issue eligible internal LTD to its parent or other upstream entity that consolidates the IDI.
	Category II, III or IV – U.S. IHC of a non-GSIB FBO (“Covered IHC”)	<p>A resolution covered IHC* would be permitted to issue either eligible internal LTD to its foreign parent or a wholly owned subsidiary of the foreign parent with a contractual conversion trigger <u>or</u> eligible external LTD to a non-affiliated third party.</p> <p>A non-resolution covered IHC† would be required to issue eligible internal LTD to its foreign parent or a wholly owned subsidiary of the foreign parent with a contractual conversion trigger.</p>	An IDI subsidiary of a Covered IHC would be required to issue eligible internal LTD to the Covered IHC or to a subsidiary of the covered IHC that consolidates the IDI.
U.S. GSIB	A U.S. GSIB is subject to existing TLAC and LTD requirements.	An IDI subsidiary of a U.S. GSIB is not currently subject to LTD requirements and would not be subject to the proposed LTD requirement.	
Foreign GSIB’s U.S. IHC	A foreign GSIB is subject to existing TLAC and LTD requirements.	An IDI subsidiary of a foreign GSIB’s U.S. IHC would be required to issue eligible internal LTD to its parent or other upstream entity that consolidates the IDI.	
Parent is not a Covered Entity, not a U.S. GSIB, and not a foreign GSIB	N/A	For an IDI whose parent is not a Covered Entity, not a U.S. GSIB, and not a foreign GSIB, the IDI would be permitted to issue either eligible internal or eligible external LTD .	
Parent controls but does not consolidate the IDI	N/A	For an IDI whose parent controls but does not consolidate the IDI, the IDI would be permitted to issue either eligible internal or eligible external LTD .	
IDI has no parent entity	N/A	An IDI with no parent would be required to issue eligible external LTD and LTD issued to an affiliate would not qualify.	

* If the top-tier FBO certifies that its planned resolution strategy involves the Covered IHC or the Covered IHC’s subsidiaries entering into resolution, receivership, insolvency or other similar proceeding in the United States, then the Covered IHC is a “resolution covered IHC.”

† If the top-tier FBO certifies that its planned resolution strategy does not involve the covered IHC or the IHC’s subsidiaries entering into resolution, receivership, insolvency or other similar proceeding in the United States, then the covered IHC is a “non-resolution covered IHC.”