



Insights

Joint Regulators Issue Comprehensive Re-proposal of the Dodd-Frank Risk Retention Rules: Perspectives on the Special ABCP Conduit Option

Client Alert

September 10, 2013 | *Client Alert*

On August 28, 2013, the Joint Regulators issued a comprehensive re-proposal of the risk retention rules required under Section 941 of Dodd-Frank. Consistent with the original rule proposed in April 2011, the re-proposal includes a risk retention option specifically designed for certain asset-backed commercial paper (ABCP) structures. We are enclosing a client alert in presentation format regarding that special ABCP conduit option. As described in our client alert, the re-proposed rule includes some modifications to the original proposed rule intended to accommodate a wider variety of ABCP market practices. However, more changes are needed because the re-proposed rule fails to provide sufficient guidance or relief to ABCP conduits or their arrangers. Comments on the re-proposal are due on October 30, 2013.

Please [click here](#) for a copy of the re-proposal of the risk retention rules and [here](#) for a copy of our client alert describing the re-proposed special ABCP conduit risk retention option.