

From: Andrew Mullineux [<mailto:a.w.mullineux@bham.ac.uk>]  
Sent: 28 July 2009 19:32  
To: Chris Hodge  
Subject: Comments

Chris,

Just read July 2009 review-smart work getting it out so soon after Walker!

My view is that 'comply or explain' is not appropriate to (big, shareholder owned) banks, which have a de facto fiduciary duty to depositors as well as shareholders and which cannot be expected to pay in full for the implicit insurance they enjoy from the taxpayer, for financial stability is a genuine Public Good in the economics sense. Hence big deposit taking banks and perhaps other financial institutions should have a separate code, whether or not some/all the Walker recommendations are incorporated in the Combined Code (or the big retail banks and OFIs should be broken up/regulated as utilities).

Best Wishes,

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