From: Kate G. Richie, PNC

Proposal: FR Y-14A/Q/M - Capital Assessment & Stress Testing (ICP #13-13; pub'd 6/25/13)

Subject: FR Y-14A/Q/M Capital Assessment & Stress Testing

Comments:

Good afternoon,

Please provide clarification on the calculations the BHCs should use for the proposed Basel fields (see below) which ask for weighted averages. Also, on quarterly files, we are providing 3 months of data; is the expectation that we are averaging across the months, or providing averages based on the most current month? Thank you in advance.

- 28. Basel II Probability of Default (PD) Report the average Basel II Probability of Default (PD) for accounts within the segment. More specifically, use the PD associated with each account's corresponding Basel II segment and then calculate the account weighted average PD of all the accounts in this specific Y-14Q segment. Note: Applicable only to the Basel II reporting banks. A one in ten probability of default should be reported as 0.1.
- 29. Basel II Loss Given Default (LGD) Report the Basel II Loss Given Default (LGD) for accounts within the segment. More specifically, use the LGD associated with each account's corresponding Basel II segment and then calculate the account weighted average LGD of all the accounts in this specific Y-14Q segment. Note: Applicable only to the Basel II reporting banks. A ninety percent loss given default should be reported as 0.9.
- 30. Basel II Expected Loss Given Default (ELGD) Report the Basel II Expected Loss Given Default (ELGD) parameter for accounts within the segment. More specifically, use the ELGD associated with each account's corresponding Basel II segment and then calculate the account weighted average ELGD of all the accounts in this specific Y-14Q segment. Missing or unavailable values should be reported as null. Note: Applicable only to the Basel II reporting banks. A ninety percent expected loss given default should be reported as 0.9.
- 31. Basel II Exposure at Default (EAD) Report the Basel II dollar Exposure at Default (EAD) for account within the segment. More specifically, report the EAD associated with each account's corresponding Basel II segment and then calculate the account weighted average EAD of all the accounts in this specific Y-14Q segment. Note: Applicable only to the Basel II reporting banks. This item is required for BHC-owned loans only

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