From:	Discover, Sara Birtch
Proposal:	FR Y-14AQM-Capital Assessment & Stress Testing (ICP #12-22; pub'd 12/20/12)
Subject:	FY Y-14AQM Capital Assessments and Stress Testing

Comments:

Please find below questions we have regarding the proposed FR Y-14M
changes to the Credit Card portfolio. Any guidance you may be able to
provide would be greatly appreciated.
When will we be provided the algorithms needed to populate the following
fields:
#2 Customer ID
#76 Corporate ID
#121 Trade Key
#118 Co-borrower ID
Field #42 (Behavioral Score) currently has the required format of N(10,6).
Are negative values allowed?
Field #59 (Month End Account Status - Closed) -
How should we treat charged-off accounts? Would they be considered '1'
(yes, closed at request of the borrower. Include charge-off account in
this category) or '4' (No. The account is not closed but is in charge off
or collection stage)?
How should we define "in collections" from option 4? How many days
delinquent would be considered in collections?
Field #85 (Promotional APR) - there are instances where a cardmember will
have multiple rates. How should we handle this? Should we use the weighted
average balance APR? If so, then the rates will change month over month as
the balance mix changes.
Field #86 (Cash APR) - similar to question 4: There are instances where a
cardmember may have multiple rates. How should we handle this?
Field #103 (Cycle End Account Status - Active) - if an account does not
cycle in the current month, should we report as Null? The other option
would be to report the month end account status for accounts that do not
cycle, but that is already reported in field #58 (Month End Account Status
- Active).
Field #118 (Co-borrower ID) - How should we report if we have both a
co-borrower on an account as well as an Authorized user? How do we
determine which authorized user to report if there are multiple on an
account?
Field #28 (Multiple Banking Relationships) - Should this be based on the
algorithm of the Customer ID field or should we use internal identifiers?

Thank you!
Sara Birtch
Discover