



**Federal Reserve Board (FR Y-14M)
Questions/Comments on the Proposed Credit Card Schedule Revision**

Account Level		
Field ID	Field Name	Comments & Questions
2	Customer ID	<p>A) If no changes are made to this field, should BHC's follow the original definition?</p> <p>B) If the change to the definition of the field is implemented, would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>
3	BHC ID	<p>A) Should the data format for this field be changed to N10 in order to be consistent with the definition of RSSD ID for all Federal data submissions?</p> <p>B) If the name of this field is changed to the proposed name, will the MDRM Mnemonic value for this field change as well?</p>
5	State	<p>If the change to the definition of the field is implemented, would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months? For example, the value 'Non US' in December 2012 data would have the same definition as the value 'NU' in March 2013 data. This would affect the Board's ability to conduct trended analysis</p>
6	Zip Code	<p>Can the Board please clarify what is meant by 'Date Format' in the definition?</p>
18	Cycle Ending Balances Mix - Promotional	<p>If the change to the definition of the field is implemented, would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>
26	Account Origination Date	<p>If the change to the definition of the field is implemented, would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>
28	Multiple Banking Relationships	<p>If the change to the definition of the field is implemented, would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months? For example, the value '1' in December 2012 data would not have the same definition as the value '1' in March 2013 data. This would affect the Board's ability to conduct trended analysis.</p>

30	Joint Account	If the change to the definition of the field is implemented, would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months? For example, the value '1' in December 2012 data would not have the same definition as the value '1' in March 2013 data. This would affect the Board's ability to conduct trended analysis.
34	Income Source at Origination	For credit card type as Business or Corporate, the Income Source may not always fit under 'Household' or 'Individual'. An example could be Business Revenue. Can the Board add additional value that is applicable to Business and Corporate Cards (like a Value of 'Other')
36	Updated Income Source	For credit card type as Business or Corporate, the Income Source may not always fit under 'Household' or 'Individual'. An example could be Business Revenue. Can the Board add additional value that is applicable to Business and Corporate Cards (like a Value of 'Other')
58	Month-end Account Status - Active	A) If the change to the definition of the field is implemented, would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months? For example, the value '0' in December 2012 data would not have the same definition as the value '0' in March 2013 data. This would affect the Board's ability to conduct trended analysis. B) Should charged-off accounts be reported with a value of '2 - Account is closed/not open' even if it has had activity in the last 12 months? C) If the name of this field is changed to the proposed name, will the MDRM Mnemonic value for this field change as well?
59	Month-end Account Status - Closed	Should charged-off accounts be flagged as '1' or as '4'?
61	Charge-off Reason	A) If an account is charged-off due to Fraud in the current month, and is reinstated in the next month, how should the BHC report this account? B) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
76	Corporate ID	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?

77	Account Billing Address - Street Address	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
78	Account Billing Address - City	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
79	Account Billing Address - Census Tract	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
80	Variable Rate Index	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
81	Variable Rate Margin	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
82	Maximum APR	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
83	Look Back Period	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
84	Rate Reset Frequency	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
85	Promotional APR	<p>A) How should multiple promotional rates be handled? For example, a BT promotion with one APR and a purchases promotion with a different APR.</p> <p>B) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>
86	Cash APR	<p>A) How should multiple promotional rates be handled? For example, a BT promotion with one APR and a purchases promotion with a different APR.</p> <p>B) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>
87	Loss Share ID	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
88	Loss Share Rate	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?

89	Other Credits	<p>A) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p> <p>B) Which transactions categories (like rebates, fraud balances, etc.) should be included in this field?</p>
90	Cycles Past Due at Cycle Date	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
91	Cycles Past Due at Month-End	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
92	Finance Charge	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
93	Fees Incurred - Late	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
94	Fees Incurred - Over Limit	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
95	Fees Incurred - NSF	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
96	Fees Incurred - Cash Advance	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
97	Fees Incurred - Monthly/Annual	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
98	Fees Incurred - Debt Suspension	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
99	Fees Incurred - Balance Transfer	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
100	Fees Incurred - Other	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
101	Debt Suspension / Cancellation Program Enrollment	<p>A) In order to keep consistent with other flag values for 'Yes' and 'No' in this schedule, should the values for this field also be '1=Yes' and '0=No'?</p> <p>B) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>

102	Debt Suspension / Cancellation Program Active	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
103	Cycle-end Account Status - Active	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
104	Cycle-end Account Status - Closed	<p>A) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p> <p>B) Should charged-off accounts be flagged as '1' or as '4'?</p> <p>C) How does the Board define 'in collections' from option 4? How many days delinquent should be considered in collections?</p>
105	Skip-a-payment	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
106	Credit Card Workout Program	<p>A) If a BHC does not offer a workout program, should the BHC report as '0'?</p> <p>B) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>
107	Workout Program Type	<p>A) If a BHC does not offer a workout program, how should the BHC report this field?</p> <p>B) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>
108	Workout Program Performance Status	<p>A) If a BHC does not offer a workout program, how should the BHC report this field?</p> <p>B) If an account is flagged as '2 - Active and non-performing', how long should this account remain '2' if it does not remain non-performing for the duration of the program?</p> <p>C) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>

109	Settlement Portion Forgiven	<p>A) If a BHC does not offer a workout program, how should the BHC report this field?</p> <p>B) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>
110	Customer Service Re-age Date	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
111	Principal Charge off Amount - Current Month	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
112	Fraud in the current month	<p>A) Should accounts which have been charged-off due to fraud be included here?</p> <p>B) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>
113	Original Credit Score Name / Version	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
114	Refreshed Credit Score Name / Version	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
115	Behavioral Score Name / Version	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
116	Credit Limit Type	<p>A) Should this be 'NULL' if the BHC reports a credit limit in field 44 that is not a 'purchase' or 'shadow' limit?</p> <p>B) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>
117	Credit Line Change Type	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
118	Co-Borrower ID	<p>A) Should the definition of this field be changed to not include authorized users?</p> <p>B) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>

119	Date Co-Borrower Was Added	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
120	Entity Type	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?

Portfolio Level		
Field ID	Field Name	Comments & Questions
28	Interest Expense	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
29	Total Non-Interest Expense	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
30	Total Non-Interest Expense - Interchange Expense	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
31	Total Non-Interest Expense - Rewards/Rebates Expense	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
32	Total Non-Interest Expense - Collections Expense	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
33	Total Non-Interest Expense - Fraud Expense	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
34	Total Non-Interest Expense - All Other Expenses	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
35	Interest Income	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
36	Fee Income	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
37	Fee Income - Late Fee Income	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
38	Fee Income - Over Limit Fee Income	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
39	Fee Income - Balance Transfer Fee	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?

40	Fee Income - Convenience Check Fee	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
41	Fee Income - Cash Advance Fee	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
42	Fee Income - NSF Fee	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
43	Fee Income - Other Fee Income	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
44	Interchange Income	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?
45	All Other Non-Interest Income	<p>A) Based on the guidelines by FFIEC for the Call Report submissions, gain or loss of a portfolio sale should be reported under Other Non-Interest Income and not ExtraOrdinary Items. In the FRB definitions this is to be reported under ExtraOrdinary Items. Should the BHC's report the gain/loss of portfolio sale under ExtraOrdinary Items or All Other Non-Interest Income</p> <p>B) Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?</p>
46	Taxes	Would the BHCs be required to submit a backfill to reflect the revision for the June 2012 – February 2013 reporting months?