



April 23, 2011

By Email: regs.comments@federalreserve.gov

Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue N.W.
Washington, DC 20551

Shagufta Ahmed
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building
Room 10325
725 17th Street N.W.
Washington, DC 20503

Re: Capital Assessments and Stress Testing Information Collection (FRY-14A/Q) OMB No. 7100-0341

Dear Ms. Johnson and Ms. Ahmed:

Wells Fargo & Company appreciates the opportunity to comment on the proposed revisions to the Capital Assessments and Stress Testing Information Collection (FR Y-14A/Q) (the "Proposal") published by the Board of Governors of the Federal Reserve (the "Board") on February 22, 2012. We appreciate the Board's on-going efforts to monitor large bank holding companies ("BHCs") to ensure that they have strong, firm-wide risk measurement and management processes supporting their internal assessments of capital adequacy and that their capital resources are sufficient given their business focus, activities, and resulting risk exposures. We support the Board's efforts to improve its understanding of BHCs' risk measurement and assessments of capital adequacy while striking a balance between the Board's need for data and the need for data requests to be practical, logical, and administratively manageable for both the Board and the BHCs which need to be able to apply these rules.

We support the positions outlined in the joint comment letter regarding the Proposal from The American Bankers Association, the Clearing House Association, and the Financial Services Roundtable (together, the "Associations"). In particular, we would like to re-emphasize the following concerns:

- The proposed FRY-14M data collection is duplicative of data collected by other regulatory agencies (the "Agencies"). Much of the data requested for credit cards, mortgage, and home equity portfolios is already provided to the OCC in the Loss Mitigation Loan Level Data Collection. Annex A of the Associations' joint letter outlines the data overlap in detail. Overlapping requests for large amounts of data with definitional variations creates unnecessary burden on BHCs, which are required to develop and maintain processes to extract, validate and format these massive data collections. At a minimum, the Agencies should collaborate to align their data requests in areas of overlap to eliminate any definitional differences. Ultimately, the Agencies should develop a central data repository to collect these data requests for use amongst the Agencies. The Board should not implement any new data collection requirements without first ensuring consistency with other existing requirements.
- Numerous data elements lack definitional clarity. As outlined in Annex B of the Associations' joint comment letter, there are a substantial number of items that the Board will need to address to provide clarity and instruction across most of the schedules. Without further clarifications, the Board will not be



able to collect consistent and accurate data as each BHC struggles to provide data under their own interpretation.

The proposed implementation date does not allow sufficient time for BHCs to develop systems to capture the required data. If the Board finalizes the reporting requirements within 30 days after the comment period, BHCs would have only 45 days in which to develop and implement the changes to the data collection prior to the June 30 reporting period. This creates undue burden given the substantial increase in the amount of data to be collected. Compounded by the lack of definitional clarity as previously noted, a June 30, 2012 implementation date is extremely burdensome. For these and other reasons discussed in the Associations' joint letter, the Proposal creates significant and unnecessary burden. Therefore, we believe that the Board should reevaluate the Proposal, coordinate amongst all the Agencies to ensure data collections are not duplicative; and clarify element definitions, ensuring alignment across all Agency collections. We strongly urge that Board delay the implementation date for the Proposal, to a date no sooner than September 30, 2012 or a minimum of 120 days following publication of the final forms and instructions, whichever is later.

We would also like to emphasize our support of particular positions in the Associations' letter regarding specific schedules of the Proposal, namely:

Proposed Operational Risk Data Collection Schedule

- Banks should not be required to submit their legal reserves for pending and probable litigation claims. Legal reserves, which have been established in consultation with a bank's legal counsel, are privileged and confidential. There can be no assurance that this information would remain confidential given the potential for wide dissemination within the Board or request by Congress for the Board to provide this data.
- The quarterly operational risk data submission should be on a one quarter lag. The Proposal's new quarterly operational loss data collection would require banks to report all losses events at and above the collection threshold established by the bank. In addition banks would be required to include detailed description of all operational loss events greater than \$100 thousand. In order to ensure accuracy and completeness, this data should be collected on a one quarter lag.

Proposed Changes to the Wholesale Schedule

- The Board should not require banks to provide a guarantor's tax ID number. We do not believe that a guarantor's tax ID number is relevant to the Board's information collection. Additionally, we have concerns that providing this information could raise privacy issues.

We appreciate the opportunity to provide our comments and concerns regarding the Proposal and join in the positions outlined in detail in the Associations' joint letter. We welcome the opportunity for further discussions. If you have questions, please contact the undersigned at 415-396-0390.

Sincerely,

David Mason
Head of Capital Management & Treasury Finance
Wells Fargo & Company

Cc:Patrick Loncar