BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
WASHINGTON, DC 20551

February 22, 2013

Mr. Brian Morrissey
Deputy Controller
American International Group, Inc.
180 Maiden Lane
New York, New York 10038

Dear Mr. Morrissey:

This is in response to your letters dated January 11 and February 1, 2013, requesting that American International Group, Inc. ("AIG"), New York, New York, be granted exemptions from the Board's regulatory reporting requirements for savings and loan holding companies. Specifically, you requested (1) confidential treatment and best efforts filing of AIG's December 31, 2012, and March 31, 2013, FR Y-9C and FR Y-9LP reports, and (2) additional relief during 2013 and 2014, as described in the attachment to this letter with respect to certain of AIG's regulatory reporting requirements.

Based on all the facts of record, the Director of the Division of Banking Supervision and Regulation, acting pursuant to authority delegated by the Board, and after consulting with the General Counsel, has determined that it is appropriate to grant AIG's requests. AIG's FR Y-9C and FR Y-9LP reports for the December 31, 2012, and March 31, 2013, reporting periods will be granted confidential treatment, and AIG may submit these forms on a best-efforts basis for these two reporting periods. In addition, the attachment to this letter details each of your other requests and the Director's response, on a report-by-report basis.

Board and Reserve Bank staff believe this relief will allow AIG to rationalize data sources, design regulatory reporting tools, and establish a regulatory governance framework that will yield a more reliable and stable regulatory reporting infrastructure with better quality data. These terms are consistent with the regulatory reporting relief that the Board has granted to

investment banks and other companies transitioning to depository institution holding company status.[1]

If you have any questions, please contact Lauren Hargraves of the Federal Reserve Bank of New York at (212) 720-1987.

Very truly yours,

Margaret McCloskey Shanks
Deputy Secretary of the Board

cc: Lauren Hargraves, Senior Vice President
Federal Reserve Bank of New York

Attachment

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[1] In 2009, the Board granted several investment banks and other companies that had recently converted to bank holding company status exemptions from, and permitted modifications to, the Board's reporting requirements. See, e.g., Board letters dated February 5, 2009, to Colm Kelleher (Morgan Stanley) and to Sarah Smith (The Goldman Sachs Group, Inc.).

Attachment

1. FR Y-11 (Financial Statements of U.S. Nonbank Subsidiaries of U.S. Bank Holding Companies) and FR 2314 (Financial Statements of Foreign Subsidiaries of U.S. Bank Holding Companies)

AIG has requested a phased-in approach to filing these reports for those of its nonbank subsidiaries that would be required to file on a quarterly basis. AIG has requested that it be permitted to submit the first FR Y-11 and FR 2314 reports as of June 30, 2013, for approximately 43 percent of its nonbank subsidiaries meeting the quarterly requirements. The remaining nonbank subsidiaries meeting the quarterly filing requirements would begin reporting as of September 30, 2013. The required annual reporting for all other nonbank subsidiaries would begin as of December 31, 2013, as scheduled. AIG has stated that such relief would allow it to continue its planned transition towards a sustainable report-preparation process, while accommodating the Board's initial filing requirements for these reports.

Response on FR Y-11 and FR 2314

AIG is granted the requested reporting relief for the FR Y-11 and FR 2314 reports. This phased-in approach is similar to that afforded other banking organizations that became bank holding companies during the financial crisis in 2008.

2. FR Y-12 (Consolidated Bank Holding Company Report of Equity Investments in Nonfinancial Companies)

AIG has requested an extension to begin filing this report as of September 30, 2013.

Response on FR Y-12

AIG is granted an extension to begin filing the FR Y-12 report as of September 30, 2013.

3. FR Y-10 (Report of Changes in Organizational Structure)

AIG has requested a phased-in approach for submitting the required FR Y-10 reports. AIG would file initial FR Y-10 reports for significant nonbank subsidiaries required to submit quarterly financial reports over the

course of the first half of 2013, with the goal of completing its initial filings by June 30, 2013. FR Y-10 reports for smaller, less significant nonbank subsidiaries, which are required to file financial reports annually, would be submitted by July 31, 2013. AIG also requested that it be allowed to submit approximately 250 FR Y-10 reports monthly from August 1, 2013, through March 31, 2014, for the approximately 2,200 entities remaining within the organization.

Response on FR Y-10

AIG is granted its request for a phased-in approach for submitting the FR Y-10 reports. However, AIG must coordinate with staff at the Federal Reserve Bank of New York to ensure there is sufficient structure information available to receive submission of financial reports when the financial report is due before the submission of the corresponding FR Y-10 report. In addition, AIG must file FR Y-10 reports on a timely basis (in conformity with the filing requirements of the FR Y-10) for all subsidiaries formed or acquired during 2013.