



May 16, 2011

Ms. Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551

Re: OMB Number 7100-0036  
Consolidated Reports of Condition and Income (FFIEC 031 and 041)

Dear Ms. Johnson:

Regions Financial Corporation (Regions) appreciates the opportunity to offer comments on the above notice of proposed rulemaking (NPR) issued by the joint agencies. The NPR proposes changes to Call Reports to capture information needed for the Large Bank Pricing model (LBP) adopted by the FDIC Board on February 7, 2011. Regions had already implemented some of the changes, but we have experienced a great deal of difficulty in attempting compliance with others. Again, we appreciate the opportunity to share our concerns.

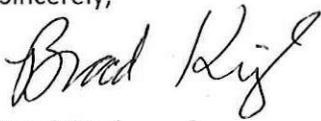
We have significant issues complying with the leveraged loan line item requirement for the June 30 Call Report. The definition provided in the NPR results in a threshold that would require us to survey our entire commercial loan portfolio on a loan-by-loan basis manually. We simply do not capture the information needed to determine leveraged loans in the required detail in a systematic fashion. We understand that banks regulated by the Office of the Comptroller of the Currency ("OCC") currently report some level of leveraged loans as defined by the OCC, but the NPR definition is more broad than the OCC definition and changed significantly from the original FDIC proposal. Regions is a state-chartered bank and is not regulated by the OCC; we do not report any level of leveraged loan information to our primary regulator, the Federal Reserve. Therefore, the determination of the leveraged loan line item for the June 30 Call Report is an entirely new process for us and one that we believe simply cannot be accomplished with the degree of confidence needed to certify the Call Report for accuracy.

Regions recommends a delay in reporting the leveraged loan line item in the Call Report. This recommendation is made due to the extreme difficulty of applicable data capture and concern over accurate reporting in such a short time frame. The leveraged loan definition should be further vetted to ensure the resulting reported amount (a) fairly captures the risk and (b) can be provided in a reasonable way by all large banks, regardless of primary regulator. All of the banking agencies need to converge on a consensus for consistency. Then a reasonable timeframe for providing numbers under any new or

refined definition should also be fully vetted, understanding that the implementation and verification of new data systems typically requires over a year. We realize that a delay would have an impact on the Large Bank Pricing Model, perhaps even a recalibration of the minimum and maximum cutoff values.

Regions appreciates the opportunity to comment on the NPR. If you have additional questions, please contact me at (205) 326-4972.

Sincerely,

A handwritten signature in black ink that reads "Brad Kimbrough". The signature is written in a cursive style with a large, stylized initial "B".

Brad Kimbrough

Executive Vice President, Controller  
and Chief Accounting Officer