

From: John L. Daniels
Proposal: FR Y-14A and FR Y-14Q - Capital Assessments and Stress Testing (#11-18)
Subject: FRY 14A & FR Y-14Q

Comments:

In response to the proposed changes to the CRE Data Collection for the CCAR 2012 reporting requirement, we wish to submit the following comments:

- The reporting requirement changes were provided as part of an ALL Bank Call on October 11 (set on October 6). The OCC had previously committed to not make current quarter changes inside 45 days of quarter end. Because these changes were communicated on October 6 and discussed on the October 11 All Bank Call as being subject to further clarification, we propose that the submission date for 3Q11 OCC CRE Reporting be moved from November 15 to December 31, 2011. This will allow time to make the required data base structure changes to accommodate the changed data elements and the addition of Data Element #43.

- The requirement for Data Element #43 related to identifying "cross collateralized and / or cross defaulted" should be modified to be only "cross collateralized and cross defaulted". The FRB presentation to the ALL Bank Meeting confirmed that a facility could be cross defaulted without also being cross collateralized and that the inclusion of facilities that are cross defaulted only will skew the data since the collateral value should not be pooled.

- Additionally, the requirement for Data Element #43 states "This includes loans that have less than \$1 million committed" . This is very problematic in that these facilities are not currently in the reporting population and will require significant data base structural changes to include in the population for purposes of identifying a very small volume of facilities. Furthermore, as discussed on the call, the population less than \$1 million is statistically insignificant to the point of the data collection. Accordingly, given its statistical irrelevance and the significant operational challenges presented by the request, we recommend excluding loans less than \$1 million from the reporting protocol.

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