

August 31, 2012

Jennifer L. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW.
Washington, D.C. 20551

Re: **OMB Control Number 7100-0341** – Capital Assessments and Stress Testing
Information Collection – Agency Form No. FR Y-14A/Q/M; Federal Register
Vol. 77, Notice No. 130, Request for Comment on Information Collection
Proposal of July 6, 2012

Dear Ms. Johnson:

Please accept this letter as BBVA USA Bancshares, Inc.'s ("BBVA USA") response to your request for additional feedback from those banks considered as first time respondents of the FR Y-14 Q/M on ways to reduce the reporting burden.

The Federal Reserve has asked for comment on the allowance of a transition period during which first-time respondents of the FR Y-Q/M may (1) use a tailored materiality threshold, (2) submit the schedules under an extended filing deadline, or (3) both. In the case of the use of a materiality threshold, our interpretation is that those thresholds would be applicable to certain credit portfolios. This would, in turn, create the need for the determination and reconciliation of the referred thresholds, which would add complexity to the overall process and further increase the burden of the reporting effort. Consequently, we believe that the use of a tailored materiality threshold during a transition period, under the conditions stated above, would not be useful in reducing the reporting burden.

The use of a transition period to allow for the submission of schedules under an extended filing deadline, however, would be useful in reducing the reporting burden. BBVA USA has been building a reporting process to gather the data for the FR Y-14 series schedules, which entails efforts related to validating sourcing of the data and testing the integrity of the data. Based on our analysis of the template's additions and changes, and the resources needed to accommodate those changes, we would be adversely impacted by these changes and additions under the proposed timeline. Additionally, as with other BHCs, BBVA USA has extensive resources dedicated to developing the capital plan for submission to the Federal Reserve in January 2013. Many of those same resources will be needed to

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address the proposed changes to the FR Y-14 Q/M schedules. An extended filing deadline would alleviate the burden associated with having to address both of these tasks in the same or overlapping time periods.

BBVA USA (1) suggests utilizing a reporting 'as of' date of September 30, 2012 for submission in conjunction with the firm's capital plan and FR Y-14A in January 2013 and (2) requests the required schedules be finalized prior to November 1, 2012.

We trust these statements are responsive to your request. As always, we appreciate the opportunity to participate in the comment process. If you have questions or require further explanation or clarification of our comments or suggestions, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Angel Reglero', is written over a circular stamp or watermark. The signature is fluid and somewhat abstract, with several loops and a long horizontal stroke extending to the left.

Angel Reglero
Chief Financial Officer

cc: Manolo Sánchez
Lawrence Uhlick
Javier Hernández
Shane Clanton
Rita Eads Milazzo
Mike Carlson
Ross Baker
Mark Sislak (via email to: mark.sislak@banking.alabama.gov)
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