

From: Robert Sciulli, The PNC Financial Services Group, Inc.
Proposal: FR Y-14A/Q/M - Capital Assessment & Stress Testing (ICP #13-13; pub'd 6/25/13)
Subject: FR Y-14A/Q/M Capital Assessment & Stress Testing

Comments:

Based on the FR_Y-14Q Corporate Loan requirements, the following is stated:

Fields 49 through 82 (Obligor Financial Data Section), should be reported on all loans as described in Loan Population on the last calendar day of the quarter, excluding loans with:

- (i) An obligor domiciled outside of the US (Field 6),
- (ii) An obligor with a NAICS code beginning with 52 (Finance and Insurance), or 5312 (Real Estate Agents and Brokers);
- (iii) An obligor that is a nonprofit organization or federal, state, or local government or related agencies; and
- (iv) An obligor that is a Natural Person.

(ii) Indicates obligors with a NAICS code beginning with 52 or 5312 are excluded from providing fields 49 through 82. Since the Mortgage REITs are excluded, We believe obligors with a NAICS code beginning with 5311 (Equity REITs) should have the same exclusion. Can this be reviewed for consideration and further clarification?

Bert Sciulli
Credit Reporting Portfolio Analyst
Risk Information Management
The PNC Financial Services Group, Inc.
249 Fifth Ave.
Pittsburgh, PA 15222
P1-POPP-09-04
(p) 412-762-2720 | (f) 412-768-6001
robert.sciulli@pnc.com