

Proposal: FR Y-14AQM-Capital Assessment & Stress Testing (ICP #12-22; pub'd 12/20/12)
Description: Proposal to revise the Capital Assessments and Stress Testing information collection (FR Y-14A/Q/M).

Comment ID: 110955
From: PNC Financial Services, Janet Spofford
Proposal:
Subject: FY Y-14AQM Capital Assessments and Stress Testing

Comments:

Hello, I sent this item previously in the list of questions we had but I wanted to specifically call out the definition of gross charge off that PNC is using to report in the portfolio portion of the Credit Card submission to the FRB.

Just for clarification...PNC includes the unallocated provisions amount into this field as there is no specific field to hold that information. We report the same figure to the OCC. Is this correct?

In addition the gross charge-off number includes purification numbers (removal of interest and fees for charged off accounts), settlements, revenue reversals. Is that your expectation as well?

Please let me know if you need further clarification of these questions.

Thank you.

Jan Spofford, PMP

Account:		
Field Name	Field Number	Definition
Customer ID	2	The CustomerID will be a unique identifier for the borrower. Complete this field using the algorithm provided the Federal Reserve Board or its agent For Business Card/Corporate Card customers, if the billing is at the consumer level, report the same customer id as the personal cards. If the billing is only at the corporate level, report blank. Note: This ID should consistent across Y-14M First Lien, Home Equity, and Credit Card Data submissions.
Basel II - ELGD	73	Report the Basel II Expected Loss Given Default parameter for the account. More specifically, report the ELGD associated to the account's corresponding Basel II segment. For example, a ninety percent expected loss given default should be reported as 0.9
Basel II - EAD	74	Report the Basel II \$ Exposure at Default for the account. More specifically, report the EAD associated to the account's corresponding Basel II segment. In particular, for open-ended exposures assign to all the accounts in a particular Basel II segment the corresponding LEQ, CCF, or related parameters, associated with that segment. After the corresponding parameter is assigned to each account, calculate the account EAD and report this as the variable value.
Corporate ID	76	A unique identifier that will be the same for the same corporation from month to month. The Aggregator will recommend a best practice for the identification or generation of this identifier and the safeguarding of account privacy information. For noncorporate card, report blank.
Promotional APR	85	Report the APR for the balance under promotion
Other Credits	89	Report the dollar amount of all credits (other than cardholder payments) received during the current month's cycle. Also, exclude fee reversals or waivers (they will be accounted for in the "Fees Incurred" line item).
Fraud in the current month	112	Report whether the account was frozen due to potential fraud or closed for cause at the conclusion of a fraud investigation in the current reporting month. 1 - Yes 2 - No
Entity Type	120	Report the entity that owns the reported loan. 1 = National Bank 2 = State Member Bank 3 = Nonmember Bank 4 = State Credit Union 5 = Federal Credit Union 6 = Non-bank Subsidiary 0 = Other
Trade Key	121	Report the trade key of the Customer using the algorithm provided by the Federal Reserve Board or its agent.
Portfolio:		

Managed Gross Charge-offs for the current month	13	Report the dollar amount of gross charge-offs recognized in the reporting month for the entire managed portfolio (including, the total amount of any write-downs, fee waivers or reversal of loan interest and fees on the credit card receivables).
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Questions/Comments
When will the algorithm be available?
ELGD - is this a bank optional field? Not sure what the definition is on this field.
EAD will be calculated quarterly so will be the same for all of the months within the quarter.
Is this for the RSSD of the corporate cards? N/A in this submission. Need to verify with Argus. PNC needs to ask the FRB on this one.
Which one should we use in a case where there are be multiple APRs for
Is it possible to get a list of transaction types expected for this? Would it include, for example, returns put on a credit card?
We are reporting fraud - in multiple months - not just within the month the fraud occurred. Is this correct?
Not sure of who the 'entity' refers to? Is this referring to PNC? Or is it referring to Corporations (we don't report corporate cards in our Credit Card submission)
Are we doing the same trade key algorithm as for OCC?

Just for clarification...PNC includes the unallocation provisions amount into this field as there is no specific field to hold that information. We report the same figure to the OCC. Is this correct?
In addition the gross charge-off number includes purification numbers (removal of interest and fees for charged off accounts), ~~settlements, revenue reversals.~~