American Bankers Association

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The Clearing House

THE FINANCIAL SERVICES ROUNDTABLE

Financing America's Economy

February 19, 2013

Robert deV. Frierson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

Dear Secretary Frierson:

The American Bankers Association,[1] The Financial Services Roundtable[2], and The Clearing House Association, L.L.C.[3] (together, the "Associations") appreciate the opportunity to comment on the revisions to the proposed annual (the "FR Y-14A"), quarterly (the "FR Y-14Q"), and monthly (the "FR Y-14M") data schedules (hereinafter the "Proposals" or "schedules") issued by the Board of Governors of the Federal Reserve System (the "Board" or the "Federal Reserve").

The Proposals revise the FR Y-14M schedules and modify the frequency for certain FR Y-14A and FR Y-14Q schedules, effective March 31, 2013. Revisions to the FR Y-14M schedules include: (1) adding data items to all three loan- and portfolio-level collections and the address matching collection; (2) clarifying several data items currently collected; and (3) deleting data items that are no longer needed.

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[1] The American Bankers Association represents banks of all sizes and charters and is the voice for the nation's $14 trillion banking industry and its 2 million employees. Learn more at www.aba.com.

[2] The Financial Services Roundtable represents 100 integrated financial services companies providing banking, insurance, and investment products and services to the American consumer. Member companies participate through the Chief Executive Officer and other senior executives nominated by the CEO. Roundtable member companies provide fuel for America's economic engine, accounting directly for $98.4 trillion in managed assets, $1.1 trillion in revenue, and 2.4 million jobs.

[3] Established in 1853, The Clearing House is the oldest banking association and payments company in the United States. It is owned by the world's largest commercial banks, which collectively employ over 2 million people and hold more than half of all U.S. deposits. The Clearing House Association L.L.C. is a nonpartisan advocacy organization representing—through regulatory comment letters, amicus briefs and white papers—the interests of its owner banks on a variety of systemically important banking issues. Its affiliate, The Clearing House Payments Company L.L.C., provides payment, clearing, and settlement services to its member banks and other financial institutions, clearing almost $2 trillion daily and representing nearly half of the automated-clearing-house, funds-transfer, and check-image payments made in the U.S. See The Clearing House's web page at www.theclearinghouse.org.

The data gathered in these reporting schedules are used to assess the capital adequacy of large banks using forward-looking projections of revenue and losses, to support supervisory stress test models and continuous monitoring efforts, as well as to inform the Board's operational decision-making as it continues to implement the Dodd-Frank Wall Street Reform and Consumer Protection Act.

There is significant merit to the supervisory and company-run stress testing process established by the Board and other agencies. The Associations appreciate that the Board continues to publish the schedules for public comment and believe that much of the data sought is relevant to the stress testing process. We have concerns with several components of the schedules, some of which relate to the importance of the data sought and some of which require further clarification. Part I of this letter addresses the Associations' substantive concerns with the schedules and worksheets, including the requirements for extensive supporting documentation to be filed in connection with the mid-year company-run stress test. Part II of this letter discusses broad concerns regarding the data collection process. Appendices A and B of the letter set forth issues that require further clarification.

PART I: Issues with specific schedules.

The Board should only require material changes to supporting documents for the proposed mid-year submission.

The FR Y-14A Summary template's supporting documentation currently proposed for the mid-year submission (July 5) mirrors the requirements for the annual submission due on January 5 of each year. The currently required supporting documentation associated with the January 5 annual submission considerably expands the time and resources needed to complete the submission of banks' reporting templates to the Board, since the pages within the supporting documentation can number in the thousands. Supporting documentation general requirements set forth within the annual submission include descriptions of methodologies for internal stress testing, translation of macroeconomic factors into projections, statistical methods utilized, model descriptions and validation information, judgment used within the forecast, risk measurement practices, model risk management policy, assumptions used to derive loss estimates, internal governance around models and methodologies, and model validation review process.

Furthermore, additional supporting documentation requirements are detailed for individual worksheets within the Summary template. This set of documents submitted by banks is supplementary to banks' internal stress testing processes and is prepared and provided as required for the benefit of the Board for effective supervisory review and assessment of the internal stress testing process. We believe requesting this volume of data every 6 months is excessive.

To alleviate the resource strains upon banks for the mid-year stress testing submission and ensure that banks can appropriately concentrate resources on developing effective stress testing processes and ultimately, prudent risk management, supporting documentation requirements should not be as extensive as that required for the annual submission. Instead, only material changes from the year-end FR Y-14A submission (a 6-month period) should be required.

The Board should develop an abbreviated mid-year submission template.

The Board's proposed revisions to the FR Y-14A would change the reporting frequency of certain schedules from annual to semi-annual. Specifically, the proposed changes would require that institutions submit the Summary and Macro Scenario schedules to the FR Y-14A to the Board by July 5 of each calendar year based on data as of March 31 of the same calendar year.[4] The FR Y-14A Summary schedule is a comprehensive data set request for each scenario, requiring banks to create a template for forecasted data at both granular and segmented levels while mapping its internal systems to FR Y-9 reporting codes. While the Associations appreciate that the mid-year stress test submission would be limited to a subset of the schedules required for the annual submission of the FR Y-14A, the burden associated with preparing the mid-year submission nonetheless remains substantial.

The Associations believe that increasing the frequency of even a limited number of FR Y-14A schedules is not necessary for a bank's company-run stress test. Instead of increasing the frequency of certain existing FR Y-14A schedules, the Associations request that the Board develop the mid-year FR Y-14A Summary schedule as an abbreviated version of the annual template, due to the banks having submitted a complete version only 6 months before. If significant changes occur within the economy, financial system, or a particular bank that would necessitate a full version of the FR Y-14A Summary template to assess systemic, idiosyncratic, or other significant risks within the bank, the Federal Reserve could still reserve the option to ask a bank to submit the complete version of the FR Y-14A Summary template at mid-year.

Requested data that require outside parties to provide the data to the banks should be reported on a best efforts basis.

Many of the data items requested by the Board are not currently captured in bank reporting systems or even a bank's paper loan files. Retrieving these data items would require banks request data from outside parties not obligated to provide the data. For example, the proposed FR Y-14M requests "performance status" of a senior lien if the respondent services the junior lien and the status of the junior lien if the respondent services the senior lien. However, many respondents will not be able to provide accurate data without estimates from companies like Equifax. Similarly, the Board also requests that banks provide the reason for a mortgage default. Identifying a specific reason for a default may require discussion with the borrower who may, or may not, be willing to discuss candidly the reasons for their default. As a result, we respectfully request that the Board apply a best efforts standard for all data items that can only be gathered through interaction with individuals or companies unaffiliated with the bank.

Field elements for existing data items should not change.

In amending the FR Y-14 it is important for the Board to maintain the currently assigned field element numbers. Changing the element numbers would impact most existing FAQs which

[4] The Associations note that the Federal Register document only requires banks to submit the Summary and Macro Scenario schedules. However, the general instructions state "[a]ll FR Y - 14A schedules are required to be reported by all BHCs with the exception of the CCR schedule, the Trading and CCR worksheets of the Summary schedule, and Historical Capital worksheets of the Operational Risk schedule." The Associations believe the Federal Register document correctly reflects the Board's intent and have commented accordingly.

reference specific field numbers. We respectfully request that data items that are removed should be left blank rather than renumbering the entire schedule.

Data consistency features built into the FR Y-14A templates should be revised to allow a reasonable variance.

Certain efforts by the Federal Reserve to build data consistency and integrity features into the reporting templates of the FR-Y14A have the unintended result of complicating the finalization of those templates. For instance, the Balance Sheet and Capital Worksheets to the FR Y-14A Summary Schedule incorporate "logic tests" to ensure consistency by verifying that ending equity, as forecasted on the balance sheet, ties to the equity figures used within the capital calculations. The template instructions require that, before submission, all such logic test fields indicate a value of "TRUE." In the current version of the FR-Y14A, these logic fields are coded as "absolutes," meaning that the figures being compared for data consistency purposes must match precisely.

Applying these absolute logic tests to data within templates designed to be shown to the nearest $1 million results in banks spending significant time addressing (by re-inputting figures rounded to the nearest $1 million) to "clear" logic fields returning a "FALSE" value. This issue most often occurs in situations involving underlying models, the forecasted results of which are automatically downloaded into the templates. Such models may produce "exact" projected figures, whereas other models may produce data already rounded to the closest $1 million. For the example used, whereas the system populating the balance sheet worksheet may produce an unrounded equity figure, the capital worksheet may be prepared with all figures already rounded to the neared $1 million. As a result, the related logic fields will return a "FALSE" indication, and the submission therefore cannot be finalized until manpower is expended to "override" the more exact unrounded figures. Given the number of scenarios, templates, and line items associated with the entire CCAR and stress testing submission process, time required to be expended by banks in this regard can be substantial and could be eliminated easily by the Board.

The Associations therefore recommend that the Federal Reserve revise these logic fields to allow for variances up to and including $1 million in either direction before the logic test yields a "FALSE" indicator. Incorporating this allowed "variance" in these logic fields would have no effect on flagging issues that could impact the consistency or accuracy of the CCAR templates. However, it would allow each institution's staff to focus their resources on the more critical aspects of the submission.

PART II: Broad concerns about the FR Y-14 process.

The Board should slow the pace of change of the FR Y-14 data requests.

For the last four years, large bank holding companies have been subject to significant and changing data requirements. In 2012 alone the Board revised the FR Y-14 requirements four times. It has been a challenging task for institutions to continually develop new systems to meet the Board's changing requirements. The Associations also note that the continual changes to the data request, which provide little time for banks to develop new or reprogram existing systems, increase the risk of errors as well as diminish the resources available to effect systems changes

responsive to changing customer needs. We respectfully request that the Board slow the pace of change so that existing systems can be used.

The Board should provide banks sufficient time to develop systems to capture the data.

The Proposals revise the existing FR Y-14 information collection to expand the number of data collection items previously collected and increasing the frequency for certain FR Y-14A and FR Y-14Q schedules. The proposed information collection would become effective March 31, 2013. Respondent banks will need to develop internal processes and procedures, hire or repurpose staff and expertise, and develop appropriate systems in order to be able to comply fully with the requirements of the Proposals. We respectfully request that the Board give additional consideration to the implementation timing of their requests and institutions' ability to provide the data. Assuming that the reporting schedules are finalized approximately 30 days after the comment period closes, banks will have only approximately 15 days to develop their systems to capture the March month end data. We believe this timing will not give institutions adequate time to implement properly the required systems changes. Moreover, the proposed timeframe would not allow for an FAQ process which would clarify much of the uncertainty surrounding some of the data items (see appendices for questions). Given the substantial amount of new data to be provided in the Proposals, the Associations believe the effective date of the Proposals should be delayed until at least June 30, 2013.

Should the Board intend to provide feedback to banks on the mid-year submission, feedback should be given through the normal supervisory process in a timely manner.

Applicable institutions have been submitting the annual data submission (FR Y-14A) for several years as part of the capital plan rule. The mid-year submission, however, is not part of the capital plan rule so there is uncertainty as to how the Board will review the submission and provide feedback. Even though the mid-year submission is distinct from the capital plan rule, if the Board intends to review and provide feedback on the submission as part of its supervisory process, examiners should provide feedback in a reasonable amount of time (such as 45 days) from submission. The Associations note that even if there is a timely turnaround on feedback, given the short amount of time between the mid-year filing and commencement of the CCAR/stress testing process, it may be very difficult for banks to incorporate supervisory feedback in the next annual stress test cycle.

The Board should provide "edit checks" in a more timely fashion.

During the first submission of the FR Y-14M, schedules, some banks did not receive the list of edit checks from the Board until 2 weeks before the submissions were due. This created substantial additional burden as systems were reworked. We urge the Board to provide "edit checks" at least six weeks prior to submission.

Prior to finalizing the schedules, the Board should conduct a thorough cost-benefit analysis, and every effort should be made to eliminate duplicative reporting.

It is unclear whether there will be a material increase in precision in the Board's loss forecasts as a result of the expanded data request given the lack of transparency in the models used by the Board during the 2013 supervisory stress testing process. The Associations also note that the significant and continual changes to the data requests, which require significant lead time for banks to develop new data tracking systems, increase the risk of errors. The Associations believe that a thorough cost-benefit analysis that takes into account the factors noted above will demonstrate that the substantial burden and costs to banks to implement the new reporting requirements outweigh the benefits.

The Associations also believe that greater alignment of overlapping and otherwise similar reporting requirements among the banking agencies is necessary. In many cases, banks are required to prepare and submit similar reports to multiple agencies that nonetheless vary enough, in the format of the data, to result in significant duplication of effort. For example, while the data required under the Federal Reserve's FR-Y14M Retail Credit Card, First Mortgage, and Home Equity schedules and the OCC's Mortgage Metrics, Loan Level and Portfolio Level Home Equity Data, and Credit Card Metrics collections are very similar, the format of those reporting requirements varies to the degree that significant additional time and resources must be devoted to fulfill the separate reporting requirements.

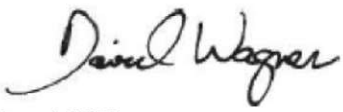
* * * *

Thank you for considering the concerns raised in this letter. We appreciate the opportunity to share our views and would be happy to discuss them further at your convenience. Given the rapidly approaching proposed submission dates and the significant effort involved in gathering the required data and populating the templates, we would appreciate receiving guidance on these matters at the Board's earliest convenience.

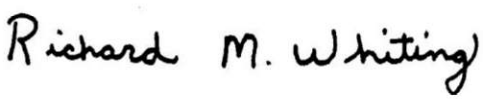
If you have any questions, please contact Hugh C. Carney, Senior Counsel at ABA at (202) 663-5324 (e-mail: hcarney@aba.com); David Wagner of The Clearing House at (212) 613 9883 (email: David.Wagner@theclearinghouse.org); or Richard Foster, Senior Counsel of the Roundtable at (202) 589-2424 (e-mail: richard.foster@fsround.org).

Sincerely,

Hugh C. Carney
Senior Counsel II



David Wagner
Executive Managing Director & Head of Finance Affairs



Richard M. Whiting
Executive Director & General Counsel

Appendix A: General requests for clarification.

The Board should immediately clarify if historical data is required for the new data items.

During the 2011 data collection exercise, CCAR banks were required to provide historical data as part of their initial submission. The Proposal makes no mention of historical data being required for the new data elements. This has led to confusion within the industry and made it difficult to allocate resources appropriately. We urge the Board to immediately clarify whether banks are expected to provide historical data as part of the revised submissions.

The Board should immediately clarify what value should be entered in data fields relevant to loan modifications if the loan has not been modified.

The proposed revisions to the FRY 14-M include fields relevant to modifications. The instructions are not clear about what values, if any, should be entered into these fields if no loan modification has occurred.

The Board should clarify how to report recently converted REO.

For the proposed enhancements to the Home Equity template and First Lien templates, banks are being requested to report on REO properties. When a loan is converted into REO, how should institutions populate the loan related fields such as "Interest Only in the reporting month" or "Bankruptcy in current month" for REO properties?

Appendix B: Specific requests for clarification.

FR Y 14-M Card

Metric #	Metric Name	Questions/Requests For Clarification
2	Customer ID	Implementation of a specific customer algorithm is high impact. Please provide more detail as to what algorithm the Board is thinking about (data elements needed, plug & play version or need each BHC to provide their own coding, etc)? Ability to implement will rely on the complexity of the algorithm. From a data reporting consistency perspective, this can potentially lead to data inconsistencies between OCC and Board reporting. If we change our source to align this field with the Real Estate submission will problems arise for the Board when trying to do historical trending or matching to the OCC submission data? Will resubmissions or a historical look-up table be required?
8	Product Type	Not clear on Co-brand vs Affinity. Some banks have been categorizing Cobrand only if there is a Retail store relationship. Is this correct?
28	Multiple Banking Relationships	Does this need to use the algorithm described in Customer ID field? Since the algorithm is not applied internally to all other portfolios, it will be very complex and require significant effort and time for IT to implement this. We also have concerns about certain contractual concerns if banks can implement across different portfolios.
29	Multiple Credit Card Relationships	
30	Joint Account	The list does not seem mutually exclusive (joint account can overlap with authorized user). This speaks to granularity lower than account level and doesn't make sense. The Board needs to clarify a hierarchy if the feed stays at account level. Board also needs to clarify how to report if an account has a co-borrower and multiple authorized users.
35	Interest Income	Description states: "Report total interest accrued on credit card receivables for the month, less any interest waived or reversed as uncollectible or any amount added to a contra-asset account for uncollectible interest that the bank BHC maintains and reports separately from the ALLL. Do not include fee income in this category." Accrued interest is often unavailable if not billed. Does the Board intend this to be interest charged?

Metric #	Metric Name	Questions/Requests For Clarification
36-38	Multiple	Description does not specify the time frame: Cycle to date, year to date, or like to date?
38	Original FICO Score for the primary account holder	Application FICO version has changed overtime. FICO versions for older historical accounts may be difficult/impossible to track down. The Board should clarify how to proceed.
43	Fee Income-Other Fee Income	Can Board clarify the difference with item 45 "Non Interest Income"? BHCs may not qualify 'other' fees the same. Can Board provide a specific list of which 'other' fees should be included in each field?
44	Current Credit limit	Should banks use Relationship Credit Limit for Commercial accounts?
45	All Other Non-Interest Income	Can Board clarify the difference with item 43 "Other Fee Income"? BHCs may not qualify 'other' fees the same. Can Board provide a specific list of which 'other' fees should be included in each field?
46	Taxes	Can Board clarify taxes on what? Pre-tax contribution?
52	Total Past Due	Information will be identical to field # 49 unless account is OL, is it intended?
58	Month-end Account Status -Active	Would charge-offs now be considered 2-Closed? In original FRB version of this field they were considered "active" if they had monetary activity (which they typically would have).
59	Month-end Account Status - Closed	How can charge-offs be considered 1-closed at request of borrower? They would always be in 4 charged off account is closed account. In what category would modifications fall?
61	Charge-off Reason	Since this is account level data, are banks only looking for identity fraud charge off and not include lost & stolen? Lost/stolen fraud would bring in additional granularity. Could theoretically have credit charge-off (values 1-5) from true cardholder plus a 6 due to lost-stolen fraud.
62	GrossCharge-offAmount–CurrentMonth	Since this is only the amount that goes against allowance, fees and interest are already excluded from this amount. Can the FRB please provide clarity around the difference between this and Field 111?
63	Recovery Amount – Current Month	If a bank is not able to get account level recovery on acquired accounts, should banks leave blank in that case?
79	Account Billing Address – CensusTract	Many banks do not capture this in house, is the Board or Argus going to provide a mapping?
82	Maximum APR	Does this refer to purchase APR or cash advance APR?

Metric #	Metric Name	Questions/Requests For Clarification
83	Look Back Period	Please clarify what is meant by "look back." Is it the lead time/notification period given to the customer prior to raising their rate? Or does it refer to a situation where the rate has already been raised, and then the bank reviews the history of the account to see if the conditions that caused the rate increase still exist (the "look back" being the historical period that is reviewed)?
83	Look Back Period	What is "change date"? Many banks do not capture this in house.
84	Rate Reset Frequency	If there is no set timeframe for resetting the rate, how should the BHC report this field? For example, if the rate is based on a 3-month LIBOR but there is no reset schedule, should the Rate Reset Frequency value be 3 (every 3 months) or 6 (others)?
84	Rate Reset Frequency	Is this correlated with # 80 (reset of index for variable rates)?
85	Promotional APR	Is there a hierarchy of promo types if more than one exists (purchase APR, BT, deferred interest)? If account has a deferred interest promo, should banks report the rate at which interest may be accruing?
86	Cash APR	Is this cash APR (no BT/Access) even if no cash balances exist?
93	Fees Incurred - Late	Definition inconsistent with OCC metric "Fees Incurred – report the dollar amount of fees posted during the current month's cycle for each category below. Report amounts net of reversals or waivers." Board does not specify the time frame, Board needs to clarify on cycle to date, year to date, or life to date.
94	Fees Incurred - Over Limit	
95	Fees Incurred - NSF	
96	Fees Incurred - Cash Advance	
97	Fees Incurred – Monthly/Annual	
98	Fees Incurred - Debt Suspension	
99	Fees Incurred - Balance Transfer	
100	Fees Incurred - Other	
103	Cycle-end Account Status - Active	Would charge-offs now be considered 2-Closed? In original Board version of this field they were considered "active" if they had monetary activity (which they typically would have).
104	Cycle-end Account Status - Closed	How can charge-offs be considered 1-closed at request of borrower? They would always be in 4 charged off account is closed account.

Metric #	Metric Name	Questions/Requests For Clarification
108	Workout Program Performance Status	How should the BHC respond if it is unable to distinguish between value 2 (Active and Non-Performing) and 3 (Broken)?
111	PrincipalCharge-offAmount–CurrentMonth	Can the FRB please provide clarity on the difference between this and Field 62?
112	Fraud in the current month	Does this include lost/stolen fraud after the new replacement has occurred? Does Board intend to include card compromise and fraud applications as well?
113	Original Credit Score Name/Version	Can banks leave null or is there an unknown value?
116	Credit Limit Type	Should banks use Relationship Credit Limit for Commercial accounts?
117	Credit Line Change Type	May not be obtainable or very complex to determine in most cases.
118	Co-Borrower ID	How to determine which authorized user ID to report if there are multiple? Does co-borrower ID follow the same logic as Customer ID? Meaning, if there is a co-borrower on a Credit Card and that individual also has a Mortgage, should the co-borrower ID on the Credit Card submission be the same as the Customer ID on the 1st Lien submission? What if an account has a Co-borrower and multiple authorized users?
121	Trade Key	Can FRB provide more detail as to what algorithm they are thinking about (data elements needed, plug & play version or need each BHC to provide their own coding, etc)? Ability to implement will rely on the complexity of the algorithm

FR Y 14-M Mortgage (First and Home Equity)

Metric #	Metric Name	Questions/Requests For Clarification
FL#90	Other Modification Action Type	For the proposed enhancements to the First Lien template, if the loan record has not been modified (i.e. FL#74=0), do we populate field FL#90 as NULL?
HE#90	Unpaid Principal Balance	For the proposed enhancements to the Home Equity template, for field HE #90, Unpaid Principal Balance (UPB) (Net), does Net UPB equal the Book Value on regulatory filings? Also, will PCI Loans include ASC-310-30 marks in this field?
HE #97	Performance of First Lien	For the proposed enhancements to the Home Equity template, for field HE #97 - Performance of First Lien, if the first lien is not held by the bank, should the code be "U"?
FL#98	Interest Rate Reduced	For the proposed enhancements to the First Lien template, what is the difference between field FL # 98 (Interest Rate Reduced) and field FL # 99 (Interest Rate Frozen)? Can an example please be provided to illustrate this difference?
FL#99	Interest Rate Frozen	
FL#98-108	Multiple	For the proposed enhancements to the First Lien template, if the loan record has not been modified (i.e. #74=0), is it expected that we populate these fields as NULL?
FL#107	Escrow Amount Before Modification	For the proposed enhancements to the First Lien template, is field FL#107 looking for the Escrow portion of the monthly payment or the full Escrow balance?
FL#108	Escrow Amount After Modification	For the proposed enhancements to the First Lien template, is field FL#108 looking for the Escrow portion of the monthly payment or the full Escrow balance?
FL #109	Alternative Home Liquidation Loss Mitigation Date	For the proposed enhancements to the First Lien template, for field FL #109 are Short Sale/Deed in Lieu considered "Traditional" or "Alternative"? They are all currently coded in field FL #77 as Traditional and not Alternative
FL#110	Alternative Home Retention Loss Mitigation Date	For the proposed enhancements to the First Lien template, if alternative loss mitigation does not apply on the record do we code field FL#110 as NULL?

Metric #	Metric Name	Questions/Requests For Clarification
FL#111 and HE#88	Original Property Value	For the proposed enhancements to the Home Equity template and First Lien templates, there are three more allowed values for field HE#88 (7, 8 & 9) than there are for field FL#111. Is it anticipated that the same allowed values would be available for use on the FL template?
FL#112	Reason for Default	What is the Board's definition of default? Is this after a certain amount of days past due? If so, what is the number of days?
FL#115	Escrow Amount Current	For the proposed enhancements to the First Lien template, what is the appropriate value in field FL#115 for non-escrow loans, NULL or zero?
FL #116 and HE#88	Escrow Amount at Origination	For the proposed enhancements to the Home Equity template and First Lien templates, what is the appropriate value in fields HE#85 and FL#116 for non-escrow loans, NULL or zero?
FL #122	Loss/Write down Date	For the proposed enhancements to the First Lien template, for field FL #122 what is the appropriate value if there have been multiple write-downs?
FL#122 and HE#95	Loss/Write down Date	For the proposed enhancements to the Home Equity template and First Lien templates, is the month of write-down sufficient or is the specific date of write-down within the relevant month required for fields HE#95 and FL#?
HE#100	Total Debt at Time of Involuntary Termination	If an account has taken a partial write-down prior to termination, would this be subtracted from the unpaid principal balance?
HE#101	Net Recovery Amount	Do you want cumulative recovery amount for each account, or just the amount recovered on an account each month? For second liens, it states to record the amount recovered on the loan. Should banks assume that this means the amount recovered at the time of the property sale? Alternatively, does this include recoveries on second liens that may occur after the sale of the property?
FL#123 and HE#102	Sales Price of Property	For the proposed enhancements to the Home Equity template and First Lien templates, should BHCs report "Actual" Sale Price or Sale Price after fees in fields FL#123 and HE#102?
FL #124	Performance of Junior Lien(s),	For the proposed enhancements to the First Lien template, for field FL #124 if the junior lien is not held by the institution, should the code be 4?
FL#120 & HE#99	Entity Serviced	Would the Entity serviced be at the BHC level, or segmented out by the entities within the BHC?

Metric #	Metric Name	Questions/Requests For Clarification
FL#129 & HE#106	Basel II - PD	The definitions requests the value as it relates to the BASEL II segment. By providing the segment level value, without the Basel II categorization, it will not allow the FRB to replicate our capital results. Is this an issue? Would you like the floored or unfloored PD? The annual CCAR process requires a 9 quarter horizon, our PD only covers 12 months - is this an issue?
FL#130 & HE#107	Basel II - LGD	The definitions requests the value as it relates to the BASEL II segment. By providing the segment level value, without the Basel II categorization, it will not allow the Board to replicate our capital results. Is this an issue? Would you like the floored or unfloored LGD? In addition, do you need the LGD information to be inclusive or exclusive of ELAO?
FL#131 & HE#108	Basel II - ELGD	The definitions requests the value as it relates to the BASEL II segment. By providing the segment level value, without the Basel II categorization, it will not allow the Board to replicate our capital results. Is this an issue? In addition, do you need the ELGD information to be inclusive or exclusive of ELAO?
FL#132 & HE#109	Basel II - EAD	The definitions requests the value as it relates to the BASEL II segment. By providing the segment level value, without the Basel II categorization, it will not allow the FRB to replicate our capital results. Is this an issue?
FL#133	Entity Type	Would the Entity serviced be at the BHC level, or segmented out by the entities within the BHC?