

From: LPS Applied Analytics, Briana Reinking
Proposal: FR Y-14AQM-Capital Assessment & Stress Testing (ICP #12-22; pub'd 12/20/12)
Subject: FY Y-14AQM Capital Assessments and Stress Testing

Comments:

Hello,

We have the following questions and comments on the proposed changes to the First Lien and Home Equity FR Y-14M Schedules.

1) FRB has proposed that field numbers 79, 86, 88 be removed from the First Lien file layout. LPS requests that the field positions be retained in the file layout and noted as retired, reserved, or another designation that the data no longer needs to be submitted. The current field numbers and field positions are heavily integrated into both BHC and LPS processes, so this would ensure that the file layout is consistent for both the banks as they create the files and LPS as it processes the files. BHCs frequently resubmit files so this would also ensure that the same field positions would apply regardless of the data month.

2) The Detailed Description for the Loan Number fields for both the First Lien and Home Equity Schedules now states that it is required that the BHC use the same loan number for the OCC and FR Y -14M data schedules. Several BHCs are currently submitting different loan numbers for these submissions. Is there a process the BHCs should follow for changing the loan number reported in the FRB file to be the same as the OCC file? For example, is a one-time supplemental mapping file needed that contains the old loan number and the associated new loan number? Or if the BHC is unable to change the loan number, would they be required to submit a supplemental file every month?

Thank you and please let me know if you need further detail.

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