



**F.N.B. Corporation**

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July 28, 2014

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

Legislative and Regulatory Activities  
Division  
Office of the Comptroller of the Currency  
400 7<sup>th</sup> Street, SW, Suite 3E-218  
Mail Stop 9W-11  
Washington, DC 20219

Robert E. Feldman, Executive Secretary  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Re: Board of the Governors of the Federal  
Reserve System  
Office of the Comptroller of the Currency  
(OCC)

Docket No. 1492; RIN 7100-AE 20

Docket ID OCC-2014-0015

Federal Deposit Insurance Corporation  
(FDIC)

RIN [].

Ladies and Gentlemen:

Thank you for the opportunity to comment on the Stress Test Rule changes (“NPR”) that were recently issued by the Board of the Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation (collectively the “Agencies”).

F.N.B. Corporation (“FNB”), headquartered in Pittsburgh, Pennsylvania, is a regional diversified financial services company operating in six states and three major metropolitan areas, including Pittsburgh, Pennsylvania, Baltimore, Maryland and Cleveland, Ohio. As of June 30, 2014, FNB has \$15.0 billion in total assets and 283 banking offices throughout Pennsylvania, Ohio, Maryland and West Virginia. FNB provides a full range of commercial banking, consumer banking and wealth management solutions through its subsidiary network which is led by its largest affiliate, First National Bank of Pennsylvania. FNB also operates Regency Finance Company, which has 71 consumer finance offices in Pennsylvania, Ohio, Kentucky and Tennessee as of June 30, 2014.

**FNB would like to comment on the modification of the dates of the stress testing cycle. Firstly, we would like to thank the Agencies for shifting the start date of the stress test cycle from October 1 to January 1. As you have noted, this will shift the heaviest burden beyond year-end tasks such as the development of annual budgets and financial reporting, and allow testing to utilize an additional full-year of actual results. In addition, moving this beyond the holiday season will significantly reduce the stress on employees in an already stressful time.**

**Under the NPR, the rule changes are not effective until January 1, 2016. FNB respectfully requests that the Agencies strongly consider making this change effective for the next stress testing cycle, which is scheduled to begin on October 1, 2014 and would, hence, begin on January 1, 2015, for the reasons mentioned above.**

**FNB would also like to request that, once the start date is moved to January 1, the stress test time frame be revised from 9 quarters to 8 quarters. This would provide two complete fiscal years of stress test projections.**

**In closing, we appreciate the opportunity to provide these comments and welcome the opportunity to discuss our views or respond to any questions. Again, we thank the Agencies for shifting the time frame of the stress tests, and request that the above modifications be given consideration for the next stress testing cycle so the benefits can be realized sooner.**

**Sincerely,**

**F.N.B. Corporation**



**Vincent J. Delie, Jr.  
President and Chief Executive Officer**



**Vincent J. Calabrese, Jr.  
Chief Financial Officer**