

From: John Hallman  
Proposal: FR Y-14A/Q/M and FR Y-16 Capital Assessments & Annual Company-Run Stress Testing(pub. 7/15)  
Subject: Information Collection Proposals

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Comments:

Public Comments on Agency Information Collection Activities; Proposals, Submissions, and Approvals:  
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Comment: One of the newly proposed fields on the CRE schedule is Fair Value Committed Exposure. The instructions state that "for held for sale loans and loans accounted for under a fair value option, report the dollar amount adjustment (positive or negative) from the Committed Exposure par balance." However, a commitment is an obligation to lend. It is not an interest earning asset. If there was a committed but undrawn amount of a facility with drawn amounts accounted for under fair value, when it was drawn, that drawn amount would be subject to the adjustment used to calculate Fair Value Adjustment Drawn. What is Fair Value Committed Exposure asking for? The committed but undrawn amount with no adjustment?

Comment: One of the new field requirements for the Corporate Loan and CRE Schedule is the SNC Internal Credit ID described as "...the reporting entity's Internal Credit ID as reported in the SNC collection for this credit facility as of the most recent filing date." Please clarify if the request is for the SNC ID assigned by the regulators or the ID assigned from the Bank's internal systems.