The Clearing House®
At the Center of Banking Since 1853®

June 10, 2016

Via Electronic Mail

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

Re: Comments in Response to the Notice of Proposed Rulemaking – *Country Exposure Report and Country Exposure Information Report FFIEC 009 and FFIEC 009a (OMB Number: 1557-0100 (OCC); 7100-0035 (Board); 3064-0017 (FDIC)*

Ladies and Gentlemen:

The Clearing House Association L.L.C.[1] appreciates the opportunity to comment on the notice of proposed rulemaking (the "**Proposal**") of the Board of Governors of the Federal Reserve System, the Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation (collectively, the "**Agencies**") to extend, with revision, the Country Exposure Report (FFIEC 009) and the Country Exposure Information Report (FFIEC 009a). The Proposal would modify these information collections effective September 30, 2016 to (i) require institutions to provide their Legal Entity Identifier on both reporting forms and (ii) add Intermediate Holding Companies to the Board's respondent panel.

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[1] The Clearing House is a banking association and payments company that is owned by the largest commercial banks and dates back to 1853. The Clearing House Association L.L.C. is a nonpartisan organization that engages in research, analysis, advocacy and litigation focused on financial regulation that supports a safe, sound and competitive banking system. Its affiliate, The Clearing House Payments Company L.L.C., owns and operates core payments system infrastructure in the United States and is currently working to modernize that infrastructure by building a new, ubiquitous, real-time payment system. The Payments Company is the only private-sector ACH and wire operator in the United States, clearing and settling nearly $2 trillion in U.S. dollar payments each day, representing half of all commercial ACH and wire volume.

The Clearing House and our member banks have observed that there is a divergence of practice across reporting firms regarding the reporting or exclusion of certain items in the FFIEC 009 and FFIEC 009a reports. We are currently engaged in collecting data on these divergent practices and will submit such data to the Agencies in a supplemental submission.

The Clearing House appreciates your consideration of our comments and would welcome the opportunity to discuss them further with you at your convenience. If we can facilitate arranging for those discussions, or if you have any questions or need further information, please contact me at (212) 613-9883 (email: david.wagner@theclearinghouse.org).

Respectfully submitted,

David Wagner
Executive Managing Director, Head of Finance &
Risk Affairs & Senior Associate General Counsel
The Clearing House Association L.L.C.

cc: Nuha Elmaghrabi
Cyndi Ayouche
(Federal Reserve Board of Governors)

Mary H. Gottlieb
(Office of the Comptroller of the Currency)

Gary Kuiper, Esq.
Manuel E. Cabeza, Esq.
(Federal Deposit Insurance Corporation)

Ken Lamar
Anthony Cirillo
(Federal Reserve Bank of New York)