

Proposal: FR Y-14A Q/M Capital Assessments and Stress Testing Reports (ICP 202208 Pub'd 3/1/22)

Description:

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Comment ID: 141805

From: American Express, Paul Williams

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Comments:

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Your comment: Comment 1: FR Y-14A/Q/M; OMB No. 7100-0341 requests a change for the entire balance of charge card loans, including any pay-over-time feature, to be reported on Schedule M.1 line item 3.b - Charge cards. As a result, the FR Y-9C Schedule HC-C and FR Y-14Q Schedule M.1 will be out of sync in its treatment of a pay-over-time feature, as we currently report these charge card pay-over-time balances on FR Y-9C Schedule HC-C line item 6.a - Credit cards. We have not been made aware of any similar proposed changes to the FR Y-9C. Please advise if this proposed inconsistency is intentional. Comment 2: FR Y-14A/Q/M; OMB No. 7100-0341 requests a change to the instructions for FR Y-14Q Schedule M.1, item 2.c, to include a reference to FR Y-9C Schedule HC-C, item 9.a. In relation to Y-14 Q&A Y140001420, we propose that the instructions for FR Y-14Q Schedule M.1, item 2.c, also include references to FR Y-9C Schedule HC-C, items 2.a, 2.b, 3, and 7. Additionally, we propose that any new FR Y-9C reference that is added to the FR Y-14Q Schedule M.1, item 2.c instructions, should have a corresponding update made to the instructions on FR Y-14Q Schedule M.2, item 2 as part of the FR Y-9C reconciliation.