

ANONYMOUS

Proposal and Comment Information

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Submitter Information

Name: Anonymous

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FFIEC 009, Schedule C, Part II, Item 12 still does not take into account the revisions to US GAAP of ASU 2016-01 about Equity Securities Not Held for Trading. This inconsistency may make some participants separate out certain securities that are included on other forms.

Clearly including NHFT securities (or at least acknowledging that they should not be included) would enhance the quality, utility, and clarity of the information collected as there would be consistency in reporting by organizations.

Thank you for your attention to this matter.