AMERICAN BANKERS ASSOCIATION, JOSHUA STEIN

Proposal and Comment Information

Title: Request for Information: Streamlining the Call Report, OP-1872

Comment ID: FR-2025-0074-01-C08

Subject

Request for Information: Streamlining the Call Report (RIN 3064-ZA51)

Submitter Information

Organization Name: American Bankers Association

Organization Type: Organization

Name: Joshua Stein

Submitted Date: 01/30/2026

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Please find our comment letter attached regarding the Request for Information: Streamlining the Call Report (RIN 3064-ZA51). Please reach out to me with any questions.

Thanks,
Josh

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January 30, 2026

Chief Counsel's Office
Attention: Comment Processing
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Washington, D.C. 20219

Benjamin W. McDonough, Deputy Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, D.C. 20551

Jennifer Jones, Deputy Executive Secretary,
Attn: Comments RIN 3064-ZA51
Federal Deposit Insurance Corporation
550 17th Street, NW
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RE: Request for Information: Streamlining the Call Report – RIN 3064-ZA51, OMB Control No: OCC-2025-0471.

To Whom It May Concern:

The American Bankers Association[1] (ABA) welcomes the opportunity to comment on the joint Request for Information: Streamlining the Call Report (the RFI)[2] by the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency (Banking Agencies) on Federal Financial Institutions Examination Council's[3] (FFIEC) FFIEC Forms 031, 041, and 051, commonly referred to as the Consolidated Reports of Condition and Income (the Call Report). The Call Report provides data on individual banks, allows for trend analysis of bank condition and trend information about the overall banking industry and serves as the basis for other reporting and policy analysis. Additionally, data provided in Call Reports serve as a foundation for other required regulatory reporting.

The RFI seeks public feedback on potential ways to streamline the Call Reports. The ABA supports efforts to reduce unnecessary burden while preserving the safety-and-soundness insights that the Call Report provides. Appendix B provides a list of ABA's recommended changes. With

[1] The American Bankers Association is the voice of the nation's $25.1 trillion banking industry, which is composed of small, regional, and large banks that together employ more than 2 million people, safeguard nearly $19.7 trillion in deposits, and extend more than $13.2 trillion in loans.
[2] 90 Fed. Reg. 55240.
[3] The Council is a formal interagency body who's voting members include the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), the Office of the Comptroller of the Currency (OCC), and the Consumer Financial Protection Bureau (CFPB), and the State Liaison Committee (SLC).

that in mind, ABA believes the banking Agencies should consider the following principles in its efforts.

Focus on Supervisory Mission

ABA believes the Call Report should be limited to collecting data that is essential for fulfilling the Banking Agencies' supervisory responsibilities. Over time, the Call Report has expanded to include items that serve secondary purposes, such as industry research or policy analysis, which significantly increases burden without improving supervisory outcomes. ABA recommends that the Banking Agencies conduct a comprehensive review of all schedules and line items to determine whether each element is directly tied to monitoring safety and soundness, capital adequacy, liquidity, or risk management. Items that do not meet this standard should be eliminated. This approach would ensure that the Call Report remains a focused, efficient tool for supervision rather than an all-purpose data collection instrument.

Leveraging Technology to Reduce Reporting Burden

ABA strongly encourages the Banking Agencies to prioritize the use of modern technology to streamline the Call Report process. Many institutions already utilize advanced data management systems, yet the current submission process remains largely manual and fragmented. Implementing an Application Programming Interface (API)-based submission platform would allow institutions to transmit data directly from core systems to regulators, reducing manual entry and minimizing errors. Additionally, pre-validation tools integrated into the submission process could identify discrepancies before filing, improving accuracy, and reducing costly resubmissions. The Banking Agencies should also consider developing standardized data schemas and offering secure cloud-based portals to facilitate real-time data exchange. These innovations would not only reduce burden but also improve data quality and timeliness, benefiting both institutions and regulators.

Address Regulatory Burden Relief Across the Regulatory Reporting Regime

ABA recommends that changes be considered in the context of the overall reporting regime. The total volume of regulatory reporting requirements is a considerable burden on institutions of all sizes. This burden cannot be captured in the review of information collection activities on an individual basis. Factors such as size and complexity should be considered in both understanding the regulatory reporting burden and in changes to streamline reporting. This is best addressed through coordinated regulatory reporting relief, tailored as necessary, across the various reporting requirements with the following recommendations:

- Resolve Definition Differences Across Reports

  The Banking Agencies should harmonize line-item definitions across reporting forms. A major source of reporting burden for institutions arises from misalignment among regulatory reporting forms that require similar data. When differences between forms are not driven by clear policy objectives, they increase manual effort and complexity by forcing banks to rely on multiple systems and processes to produce overlapping information. Even temporary differences—such as the recent inconsistency in reporting non-depository financial institution (NDFI) exposures in the Call Report and the FRY-9C—create meaningful and avoidable burden by requiring firms to maintain parallel reporting frameworks. Aligning definitions reduces confusion and improves data quality.

- Rationalize Reports and Line Items

  ABA urges the Banking Agencies to conduct a comprehensive rationalization of both entire reports and individual line items. This should include identifying and eliminating redundant data elements and considering the decommissioning of reports with redundant data or with limited utility. Banking Agencies should also consider reporting frequency and opportunities to consolidate reporting. Transparency regarding how collected data is used would help institutions prioritize resources effectively.

- Enhance Collaboration and Preparer Input

  The Banking Agencies should actively seek input from reporting institutions of varying sizes and complexities. Banking Agencies should consider this input to 1) identify inefficiencies, 2) confirm institution-to-institution reporting requirements and 3) understand the level of effort and necessary lead time for changes to reporting requirements. The Banking Agencies should consider a formal advisory group and informal periodic outreach to understand challenges and opportunities to improve information collection processes. This collaborative approach would ensure that changes reflect operational realities.

- Ensure Consistency and Futureproofing

  ABA recommends the Banking Agencies develop FAQs tied to reporting instructions to promote consistent interpretation. Clear and timely guidance is essential for accurate reporting. ABA also recommends the Banking Agencies develop a formal inter agency process to review all information collection activity changes relative to current information collection requirements for opportunities to achieve supervisory objectives with the information already available and to prevent the creation of definition inconsistencies, redundancies, or other forms of preventable regulatory reporting burden.

- Recognize Materiality and Error Frameworks

  The Banking Agencies should allow institutions to develop a materiality framework to guide responses to reporting errors and noncompliance. Communicating the relative importance of data elements would help institutions design appropriate controls. Additionally, an exception framework for Part 370 reporting should be developed to address factors outside the institution’s control.

Attached are our remaining comments and recommendations that correspond to the questions posed in the RFI (Appendix A) and a list of ABA's recommended changes (Appendix B). Thank you for considering these comments and I look forward to our continuing dialogue on this effort. If you need additional information or have questions, please contact me (jstein@aba.com; 202-663-5318).

Sincerely,

Joshua Stein

Appendix A: Answers to Questions in the RFI

General Questions on the Call Report

Q1. Which specific line items or schedules on the Call Report are the most time-consuming to prepare or require significant manual adjustments (for example, to convert internal data from core data processing, general ledger, or other systems into the form required) to complete the Call Report? Why is this the case?

Response: Across our member institutions, the most time-intensive portions of Call Report preparation share several common characteristics. Although the specific schedules vary by institution size and business model, the underlying challenges tend to be a result of:

- Banks' internal systems often do not align with how the Call Report defines categories. When regulatory definitions differ from internal classification logic banks must manually segment or re-map data.
- Many banks operate with multiple operational systems, for example lending, deposits, investments, treasury, derivatives, or commitments. As a result, banks must combine and reconcile data from different platforms.
- Where system-generated data is insufficient, banks frequently turn to manual processes for aggregation, mapping, or adjustments.
- Certain portions of the Call Report require highly detailed segmentation that internal systems are not designed to produce automatically.
- Call Report instructions evolve frequently—whether due to capital changes, new accounting standards, deposit insurance updates, or emerging risk areas. Banks must revise mappings, retrain staff, reconfigure systems, and create new manual processes each time requirements shift.

See the List of Recommended Changes in Appendix B for a detailed list of changes recommended for reducing burden.

Q2. For institutions that use manual processes to complete the Call Report, is there software available, from core system vendor(s) or elsewhere, to increase automation and efficiency? If so, what are the hurdles, if any, to utilizing such software?

Response: The ABA recognizes that there is software available from both core system vendors and specialized regulatory reporting vendors that can increase automation and efficiency in Call Report preparation.

However, the main hurdles are:

- Data integration: Even with software, mapping fields from multiple internal systems (loan, deposit, treasury, off balance sheet, and credit models) into a single data model requires significant initial effort and ongoing maintenance.

- Change management and validation: Implementing automation requires parallel runs, extensive testing, and internal model validation to ensure mapping accuracy. This can temporarily increase burden.
- Vendor standardization vs. institution customization: Off the shelf tools may not fully reflect the specific product set or account structure of an institution, reducing the benefit of automation without substantial customization.

Q3. Certain Call Report data items may not be applicable for banking organizations that conduct a narrow range of business activities. To what extent and in what ways does the inclusion of Call Report data items that do not apply to a respondent on an ongoing basis affect data quality and respondent burden?

Response: Call Report line items and schedules that rarely or never apply to a narrow focus institution (for example, one that does not engage in trading, derivatives, complex securitizations, or foreign operations) create burden in several ways:

- Review effort: Staff must review and document that these items remain not applicable, quarter after quarter, to satisfy internal controls and audit expectations.
- Risk of misclassification: Complex or rarely used items can lead to confusion or inadvertent misreporting if staff misinterpret definitions, particularly when new personnel are involved.
- Training and documentation: Time is spent training staff on schedules that have no practical relevance to the institution’s activities, diverting resources from higher risk areas.

Reducing the number of non-applicable items that an institution must actively consider may directly reduce burden and potential for errors.

See the List of Recommended Changes in Appendix B for a detailed list of changes recommended for reducing burden.

Q4. What process changes, if any, should the agencies consider for filing the Call Report?

Response: Several process changes could reduce burden:

- Centralized communication and FAQ processes
  The Banking Agencies should implement a formal FAQ process for the Call Report. This should include a single, frequently updated repository of Call Report FAQs and interpretations, clearly dated and searchable by schedule and line item, would reduce ambiguity. The Banking Agencies should update the Call Report instructions based on FAQs received from reporting firms to ensure consistency across respondent firms.

- Improved pre-validation and error messaging

Enhance the validation tools so that error and warning messages are more descriptive, including likely causes and examples. This reduces time spent deciphering generic error codes. Additionally, the agencies should review all edit checks to ensure their continued applicability and remove any edit checks that are outdated or inaccurate and can result in significant burden.

- Change management transparency and lead time
  The Banking Agencies should provide ample time to implement reporting changes and ensure updated forms and instructions are published sufficiently in advance of relevant reporting dates. Additionally, the Banking Agencies should consider consolidated "change packages" (rather than multiple incremental changes) would allow institutions to adjust systems and training more efficiently.

See the List of Recommended Changes in Appendix B for a detailed list of changes recommended for reducing burden.

Q5. Are there specific recordkeeping requirements associated with completing the Call Report that the agencies should address?

Response: Recordkeeping requirements tied to the Call Report could be clarified and streamlined as follows:

- Clarify minimum documentation expectations
  Provide guidance on the types of documentation and workpapers expected to support key judgments (e.g., risk weighted asset assignments, allowance allocations, and significant reclassifications), particularly for smaller institutions.

- Allow standardized templates
  Agencies could publish optional standardized templates for common reconciliations (e.g., tie out from GL to Call Report schedules, CECL to RI B/RI C disclosures). This may be particularly useful for smaller institutions as a means to promote consistency for both the institution and the auditor and examiner review of the information.

- Retention and versioning guidance
  Clear expectations on retention and versioning of mapping documents, queries, and scripts used to produce Call Report data would help align practices across institutions and examinations.

See the List of Recommended Changes in Appendix B for a detailed list of changes recommended for reducing burden.

6. During the EGRPRA review, respondents suggested the agencies consider adjusting the due dates for the Call Reports, for example, to avoid falling on a weekend or holiday. In what way, if any, would changing due dates for the Call Reports reduce respondent burden?

The Banking Agencies should extend the Call Report due date falling on a weekend or holiday by allowing the due date to be the next business day if the due date falls on a weekend or holiday (consistent with the FR Y-9C requirement). Additionally, the Banking Agencies should extend Call Report due date to align with the FR Y-9C due date. Aligning the timelines of the Call Report with the FR Y-9C would increase efficiencies and ease burdens because many firms' Call Report processes are largely aligned with their FR Y-9C processes.

See the List of Recommended Changes in Appendix B for a detailed list of changes recommended for reducing burden.

Q7. What technology changes, if any, related to the submission of the Call Report could reduce respondent burden? Would these technology changes have the same impact on small and large respondents alike? Are there different considerations for institutions with complex activities versus those with a more traditional business model?

Response: Potential technology enhancements include:

- More robust APIs or secure data upload channels: Allowing institutions or vendors to submit machine readable files directly from internal reporting systems would reduce manual keying and file manipulation. This could also support the single submission of a data item that may currently be included in multiple regulatory reports.
- Enhanced testing/sandbox environments: A stable test environment where institutions can validate format changes and new schedules prior to going live would reduce last minute problems.
- Standard dashboards and diagnostics: Providing feedback dashboards after submission (e.g., summary of key ratios, unusual value flags compared to prior periods or peers) could help institutions detect and correct anomalies quickly.

See the List of Recommended Changes in Appendix B for a detailed list of changes recommended for reducing burden.

Q8. In what ways, if any, should the agencies consider modifying the Call Report forms or instructions, including their layout, structure, and availability, to improve their usability and reduce the resources required to prepare and file the report?

Response: Link the online Call Report form schedules and line items to the respective instructions and definitions.

As noted in response to question 4, develop a single, frequently updated repository of Call Report FAQs and interpretations. Then link these to the relevant Call Report instructions and definition. It will help clarify definitions and edge cases. It will also reduce ambiguity and disparities in practice.

See the List of Recommended Changes in Appendix B for a detailed list of changes recommended for reducing burden.

Q9. Are there current or emerging uses of technologies that the agencies should consider when reviewing the structure, content, or publication of the Call Report forms or instructions?

Response: Current and emerging technologies that could be leveraged include:

- Structured data standards (e.g., XBRL or similar): A consistent, stable taxonomy enables automated mapping, easier validations, and better analytics for both institutions and the agencies.
- Data lineage and governance tools: Many institutions are investing in data governance platforms; aligning Call Report structures with common enterprise data models would facilitate reuse of existing reporting pipelines.
- Business intelligence and dashboards: Agencies could publish more interactive tools for institutions to explore their own Call Report data, peer comparisons, and trends, helping institutions validate reported data and understand supervisory perspectives.
- Robotic process automation (RPA)/low code tools: Simpler, more standardized input formats and fewer one-off special cases would better support use of RPA and low code tools to bridge gaps between systems at smaller institutions.

Q10. In what ways, if any, through what mechanisms, and with what frequency should any specific threshold in the Call Report instructions be revised or indexed on an ongoing basis, and why? Relatedly, in what ways, if any, could the agencies further align the content of each version of the Call Report to the risk profiles of applicable filers?

Response: ABA supports indexing the thresholds to inflation and a formal commitment to review thresholds as part of the periodic review process.

Short Form Call Report Eligibility and Content

Q11. Are there reasons eligible institutions have or have not chosen to use this option? Are there ways for the agencies to make this option more appealing to currently eligible institutions?

Q12. In what ways, if any, could the agencies revise the criteria for institutions to be eligible for reduced reporting while ensuring the safety and soundness of financial institutions and the financial system, and why? For example, should the eligibility for reduced reporting be related to a respondent's capital position or its ability to meet risk-based criteria?

Q13. Similarly, in what ways should the eligibility for reduced reporting be related to a respondent's business model and why? What readily available quantitative criteria do *commenters consider most indicative of a community banking organization conducting a traditional banking model and why?*

Q14. In what ways, if any, could the agencies further streamline the content of the short form Call Report in the first and third quarters of the calendar year to reduce burden on community banking organizations while ensuring their safety and soundness? What items other than those required by statute are essential for community banking organizations to report in the short form Call Report? To what subset of Call Report respondents should such revisions apply and why?

Q15. Should the agencies set a higher size threshold for the availability of the short form Call Report in the first and third quarters of the calendar year? If so, what should the total asset size be?

Q11-Q15 Response: Short form reporting does not accrue significant benefits as it requires a change in process every other quarter by eliminating the requirement to produce certain information less frequently. Other forms of burden relief are form more effective than reducing the reporting frequency of certain line items.

See the List of Recommended Changes in Appendix B for a detailed list of changes recommended for reducing burden.

Q16. Which specific Call Report data items or schedules, if any, do commenters consider nonessential for agencies to monitor safety and soundness or serve other mission critical needs? In your response, provide an explanation of whether these data items or schedules would relate to all respondents, or a subset of respondents based on specified asset size or risk profile.

Response: From a safety and soundness perspective, certain data items and schedules appear less essential, particularly for smaller, traditional institutions.

See the List of Recommended Changes in Appendix B for a detailed list of changes recommended for reducing burden.

Data Usage

Q17. To what extent and for what purposes do institutions and other stakeholders use Call Report and UBPR data (for example, peer comparison purposes, asset-liability management, shareholder meetings, and incentive compensation)?

Response: Institutions and other stakeholders use Call Report and UBPR data for:

- Peer comparison and benchmarking
- Asset liability management and planning

- Regulatory and investor communications
- Investor Research

ABA believes that data inconsistency can lead to confusion in the equity markets. For example, investor analysis around loans to NDFIs and uninsured deposits is materially impacted by data inconsistency and limited understanding of Call Report data definitions that do not align with financial reporting or other common uses.

See the List of Recommended Changes in Appendix B for a detailed list of changes recommended for reducing burden.

Q18. In what ways, if any, would removing or reducing the frequency of certain data items or schedules impede these uses?

Q19. Are there data items in the Call Report that could be collected less frequently or at a more aggregated level that would have little or no impact to Call Report users?

Q20. Conversely, are there data items that are currently reported by institutions for which there is a need for more frequent or more granular collection? Why is this additional frequency or granularity needed?

Response Q18-Q20: ABA believes that efforts to reduce unnecessary or redundant data, increase data consistency, and clarify data definitions and requirements will improve the use of data.

See the List of Recommended Changes in Appendix B for a detailed list of changes recommended for reducing burden.

Other Considerations on Regulatory Reporting

Q21. How can the agencies balance the content and frequency of reporting requirements, on-site examinations, and discussions with management to better achieve the agencies' missions and limit burden for institutions?

Response: ABA supports a balanced approach and alignment between content and frequency of reporting requirements, on-site examinations, and discussions with management. The Banking Agencies should consider the following to balance reporting requirements with on-site exams and discussions:

- Coordinate data and examination expectations:
  Where detailed Call Report data is reduced, examination procedures and management discussions could more explicitly address those areas on a periodic basis, rather than continuously.
- Promote transparency and predictability:

Clear communication on how Call Report data feeds into examination planning and risk assessment would help institutions understand the value of the data they provide and support more efficient allocation of internal resources.

This balanced approach can help the Banking Agencies meet their safety and soundness and consumer protection missions while limiting unnecessary burden, especially for community banking organizations.

Appendix B: List of Recommended Changes

I. General (Process changes, Threshold Indexing, and Instruction Clarifications)

Schedule	Line item	Requested change type	Description of recommended change
N/A (Submission process)	FAQ process	Process enhancement	Create a joint, formal FAQ process with predictable cadence to ensure consistent interpretations and reduce disparate reporting.
N/A (Submission process)	Due dates	Process enhancement	Align Call Report due dates with FR Y-9C (40/40/40/45 days) and avoid weekend/holiday due dates. See Q7 above.
N/A (Change Management)	Lead Time for Changes	Process enhancement	Provide ample time to implement reporting changes and ensure updated forms and instructions are published sufficiently in advance.
N/A (Edit checks)	All edit checks	Process enhancement	Perform holistic review to remove/correct outdated or inaccurate edits that create false positives and unnecessary work.
N/A (Submission process)	Pre-submission validation	Process enhancement	Add a pre-submission validation/preview step (like Reporting Central) to reduce uncertainty and rework.
N/A (Submission process)	Pre-submission validation	Process enhancement	Develop APIs or secure upload data channels for institutions or vendors to submit machine readable files directly from internal reporting systems
N/A (Submission process)	Pre-submission validation	Process enhancement	Create a stable test environment where institutions can validate format changes and new schedules prior to going live
N/A (Thresholds)	Static thresholds	Standardize thresholds	Index/coordinate thresholds across agencies to prevent scope creep from inflation and keep categories empirically grounded.
N/A (Record Keeping)	Documentation	Standardize documentation expectations	Provide guidance on the types of documentation and workpapers expected to support key judgments. For example, Banking

Schedule	Line item	Requested change type	Description of recommended change
			Agencies could publish optional standardized templates for common reconciliations
N/A (Record Keeping)	Documentation	Record Retention	Clear expectations on retention and versioning of mapping documents, queries, and scripts used to produce Call Report data would help align practices across institutions and examinations.
RC-C	Line 1(a) Construction, land development, other land	Clarify instructions	Simplify reclassification of construction loans upon completion; remove requirement to remain in line 1(a) until amortization begins.
RC-C	Line 3 Agricultural production	Clarify instructions	Avoid burden of purpose-based stratification for personal loans to farmers including credit card loans and allow them to be reported in Line 6 Consumer loans.
RC-C	Line 9 NDFIs	Clarify instructions	Clarify NDFI classification for certain financial entities (e.g., entities financing or investing for affiliates, non-securitization SPVs, etc.).
RC-E, Part 1	Line 1 Deposits of individuals, partnerships, and corporations	Clarify instructions	Allow treating trust fund deposits of individuals, partnerships, and corporations when beneficiary data are not available.
RC-E, Part 1	Lines 1–6 Deposits	Clarify instructions	Permit use of KYC/NAICS counterparty types for consistent deposit classifications.
RC-E, Part 1, Memoranda	Lines 5–6 Consumer deposit products	Clarify instructions	Clarify definition of “intended for consumer purposes” to standardize reporting.
RC-O, Memoranda	Line 18 Two-year PD	Clarify instructions	Update the stress-period references (2007–2011) to avoid “unscorable” for newer products and improve relevance.

Schedule	Line item	Requested change type	Description of recommended change
RC-R, Part 2	Line 17 All other off-balance sheet liabilities	Clarify instructions	Clarify treatment where certain risk-weight columns are disallowed; ensure appropriate entries are permitted.
RC-R, Part 2, Memoranda	Line 4 ACL on PCD assets	Clarify instructions	Restrict reporting to acquisition period to match life-cycle relevance.
RC-P	Line 5 Mortgage-related noninterest income	Clarify instructions	Clarify scope (only noninterest income earned from direct activities of selling, securitizing, and servicing vs. related noninterest income) for consistent application.

II. Alignment with FR Y-9C, Other Regulatory Reports, and U.S. GAAP

Schedule	Line item	Requested change type	Description of recommended change
RI	5.c Trading revenue; 5.l Other noninterest income	Align with U.S. GAAP	Allow reporting FV changes for certain non-trading derivatives/FVO items (e.g., structured notes issued) in Line 5.c Trading revenue together with FV changes of associated hedges (principal transactions) to avoid artificial volatility.
RI	7.c(1) Goodwill impairment losses	Line item description	Amend the description to "Goodwill impairment losses and Amortization" as it includes amortization of Goodwill allowed in Private Company accounting in US GAAP.
RI-B, Part 2, Memoranda	Line 1 ATTR	Align with U.S. GAAP	ATTR is non-GAAP; remove unless a clear safety/soundness need exists, reducing RAP-GAAP differences.
RC – Balance Sheet	Line 2 Securities Line 5 Trading assets Line 14.b Securities Sold Under Agreements to repurchase	Aling with U.S. GAAP	Revise the guidance in Glossary for Repurchase/Resale Agreements to align reporting of securities in instances where the securities are sold to a third party where the third party does have the right to repledge or resell with U.S.GAAP under which the securities continues to be reported in Securities or Trading assets.
RC-B, Memoranda	Line 2 Debt securities maturity/repricing	Align with FR Y-9C	Reduce granularity and match FR Y-9C HC-B memoranda structure for consistency and lower burden.
RC-C, Part 1	Line 8 Obligations of states/political subdivisions	Align with FR Y-9C	Eliminate the line item; report it under "All other loans" as on FR Y-9C HC-C line 9.b(2) to remove divergence.
RC-C, Part 1, Memoranda	Line 2 Loans maturity/repricing	Align with FR Y-9C	Replace six buckets with single "within one year" bucket; align with FR Y-9C HC-H line 1.

Schedule	Line item	Requested change type	Description of recommended change
RC-F	Line 6 All other assets itemization	Align with FR Y-9C	Eliminate granular subitems; align with FR Y-9C HC-F (no comparable itemization), reducing manual effort.
RC-K	Line 11.b/.c Time deposits by balance	Remove duplication	Eliminate split; RC-E Memoranda already collects similar data; aggregate to reduce duplication.
RC-O	11(a)/(b) Custodial bank deduction/limit	Align across reports	Allow quarterly averaging consistent with RC-R to avoid daily/weekly operational burden (may require FDIC rule change).
RC-O, Memoranda	Line 2 Estimated uninsured deposits	Align across reports	Permit use of FDIC Part 370 uninsured amount; exclude pending items; collect pending items confidentially if needed.
RC-O, Memoranda	Lines 14–15 Largest/top-20 counterparty exposures	Align methodology	Permit use of SA-CCR (not just CEM) approach to avoid dual processes where SA-CCR is used.
RC-R, Part 2, Memoranda	Lines 2–3 Derivative notionals	Remove duplication	Duplicative of RC-L; eliminate to harmonize and reduce redundancy.

III. Reduction of Granularity and Materiality Thresholds

Schedule	Line item	Requested change type	Description of recommended change
RI	2.a(1) subitems b(2)/b(3) Time deposits ≤/> $250k	Reduce granularity	Aggregate time deposits; balance-size split is manual and not how banks manage these exposures.
RI	7.c(1) Goodwill impairment losses	Line item description	Amend description to include amortization as it includes amortization of Goodwill allowed in

Schedule	Line item	Requested change type	Description of recommended change
			Private Company accounting in US GAAP.
RI, Memoranda	Line 8 Trading revenue details	Reduce granularity	Eliminate subitems by asset class and creditworthiness; report aggregated trading revenue.
RI, Memoranda	Line 15	Reduce granularity	Eliminate breakout by consumer/non-consumer
RI-E	Entire Schedule	Reduce granularity	Consolidate categories to a level commensurate with safety and soundness objectives. For example, consider the necessity of separate line items such as postage expense or printing, stationery and supplies expense.
RI-E	Line 1 Other noninterest income	Standardize thresholds	Standardize the itemization threshold to align with RC-F/RC-G ($100k and >25%) to eliminate inconsistent triggers.
RC-C, Part 1	1(c) subitems 1–2 1–4 family revolving vs. closed-end	Reduce granularity	Aggregate; the distinction adds burden without commensurate supervisory value.
RC-C, Part 1	Line 2 subitems a–c Loans to depository institutions	Reduce granularity	Aggregate across type/location; current splits drive manual processes.
RC-C, Part 1	Line 4 subitems a–b C&I by domicile	Reduce granularity	Report one aggregate amount; domicile split not clearly risk-relevant.
RC-C, Part 1	Line 6(b) Other revolving credit plans	Reduce granularity	Eliminate subitem; include within 6(d) Other consumer loans for simplicity.
RC-C, Part 1, Memoranda	Line 1 Loan modifications to borrowers with financial difficulty	Reduce granularity	Aggregate subitems where disaggregation is not necessary for

Schedule	Line item	Requested change type	Description of recommended change
			safety/soundness and does not match industry practices.
RC-C, Part 1, Memoranda	Line 8 Closed-end loans with negative amortization features secured by 1-4 family residential properties in domestic offices	Materiality threshold	Add a materiality threshold (e.g., % of portfolio) to reduce reporting burden.
RC-E, Memoranda	Line 2 Nontransaction accounts by balance	Reduce granularity	Consolidate time deposit breakouts regardless of balance; remove immaterial splits to cut manual work.
RC-E, Memoranda	Line 2(e) IRAs and Keogh Plan accounts of $100,000 or more	Update threshold	Raise threshold from $100k to $250k to reflect current environment and reduce immaterial reporting.
RC-E, Memoranda	Lines 3–4 Time deposits maturity/repricing by balance tiers	Reduce granularity	Consolidate by maturity regardless of balance; eliminate subitems a/b to avoid manual repricing data.
RC-L	Line 12(c)/(d) subitems 1–2 Options written vs purchased	Reduce granularity	Remove written/purchased split; report all exchange-traded in 12(c), OTC in 12(d).
RC-L	Lines 13–15 Trading vs non-trading derivatives	Reduce granularity	Combine notional and fair value reporting across purposes to reflect unified risk view.
RC-M	Line 5 Other borrowed money	Reduce granularity	Aggregate FHLB and other borrowings; reduce maturity bucket detail to what is safety/soundness-relevant.
RC-O	Entire Schedule Memo line 1 Total deposit liabilities of the bank, including related interest accrued and unpaid, less allowable exclusions	Reduce granularity	Consider eliminating Memo line 1 and opportunities to reduce granularity or redundancy. Incredibly time consuming.

Schedule	Line item	Requested change type	Description of recommended change
RC-P	Entire Schedule	Threshold	Consider increasing the threshold from $10 million to $100 million.
RC-T	Lines 4–11 Fiduciary asset types	Eliminate or Simplify categories	Eliminate categories or replace them with aggregated product account types (trusts, investment accounts, and custody).
RC-T	Lines 4–13 Column C Number of managed accounts and Column D Number of non-managed accounts	Eliminate	Eliminate the column. Difficult to produce; limited supervisory value.
RC-T	Lines 14–21 and 22 Gross fiduciary income	Eliminate or reduce frequency	Eliminate the line item or reduce reporting frequency. Onerous to isolate and not core to quarterly safety/soundness.
RC-T	Line 23 Expenses	Eliminate or reduce frequency	Eliminate the line item or reduce reporting frequency. Onerous to isolate; limited incremental value.
RC-T	Line 24 Net losses	Eliminate or reduce frequency	Eliminate the line item or reduce reporting frequency. Onerous to isolate; limited incremental value.
RC-T	Line 25 Intracompany income credits	Eliminate or reduce frequency	Eliminate the line item or reduce reporting frequency. Onerous to isolate; limited incremental value.
RC-T, Memoranda	Line 1.q Column A Managed assets and Column B Number of managed accounts	Eliminate	Eliminate the line item. Difficult to compile; limited supervisory value.
RC-T, Memoranda	Line 2 Corporate trust and agency accounts	Eliminate	Eliminate the line item. Difficult to compile

Schedule	Line item	Requested change type	Description of recommended change
RC-T, Memoranda	Line 3 Collective investment funds and common trust funds	Eliminate	Eliminate the line item. Difficult to compile.
RC-T, Memoranda	Line 4 Fiduciary settlements and losses	Eliminate or reduce granularity	Eliminate the line item or consolidate subitems a. through d. into an aggregated single line item. Significant preparation burden; not readily available across systems.

IV. Elimination and Reduction of Reporting Frequency

Schedule	Line item	Requested change type	Description of recommended change
RI	Line 5(a) Fiduciary noninterest income	Eliminate or reduce frequency	Eliminate or reduce frequency. Cost to isolate may outweigh quarterly supervisory value.
RI, Memoranda	Line 13 Net gains/losses on FVO items	Eliminate or reduce frequency	Eliminate or reduce frequency. Burdensome isolation; limited incremental insight quarterly.
RC-C, Part 1, Memoranda	Line 5 Real estate loans to non-U.S. addressees	Eliminate	Eliminate the item. Duplicative/limited incremental insight.
RC-C, Part 1, Memoranda	Line 16 Revolving 1–4 family converted	Eliminate	Eliminate the item. Limited supervisory value.
RC-F	Entire schedule	Eliminate or streamline	Review and potentially eliminate non-essential lines that exceed supervisory value.
RC-G	Entire schedule	Eliminate or streamline	Review and potentially eliminate non-essential lines to streamline.
RC-L	Line 14(a) Pay-fixed interest rate swaps	Eliminate	Eliminate the item. Granular product split adds limited value relative to burden.

Schedule	Line item	Requested change type	Description of recommended change
RC-M	Line 17 a-e. PPP and PPPLF	Eliminate	Eliminate these items. Outdated
RC-N, Memoranda	Line 6 Derivatives FV as assets	Eliminate	Eliminate the item. Limited supervisory value.
RC-N, Memoranda	Lines 7–8 Additions/sales of nonaccrual assets	Eliminate	Eliminate the items. Six-month granular activity adds limited supervisory value.
RC-Q	Entire schedule	Eliminate and relocate	Eliminate the schedule; move Level 3 FV content to RC-M; current design is burdensome.
RC-S	Entire schedule	Reduce frequency	Shift to annual/semi-annual; granular prep is burdensome and often immaterial quarterly.
RC-T	Entire schedule	Reduce frequency	Shift to annual/semi-annual; data not readily available across systems and requires manual production.
RC-V	Entire schedule	Eliminate	Eliminate the schedule; data do not material information for safety/soundness.