

**Meeting Between Staff of the Federal Reserve System, Representatives of the Financial
Services Roundtable, and Various Industry Participants
October 23, 2015**

Participants: Cynthia Ayouch, Cassandra Quimby, Langston Shaw, Laura McGaughey, Laurie Priest, Michael Kraemer, Nawsheen Rabbani, Nuha Elmaghrabi, Richard Palmer, and Virginia Wall (Federal Reserve Board)

Brian Osterhus and Ken Lamar (Federal Reserve Bank of New York)

Larry Cordell and Vidya Shenoy (Federal Reserve Bank of Philadelphia)

See Attachment B for a list of industry participants

Summary: Staff from the Federal Reserve System met with representatives and members of the Financial Services Roundtable and industry participants to discuss the Federal Reserve's recent and ongoing data collection efforts, including the FR Y-14 series reporting forms. The attached presentation (Attachment A) was distributed at the meeting and reflects the scope of items that were discussed.

Attachments

Attachment A



FINANCIAL
SERVICES
ROUNDTABLE

Continuing the FR Y-14 Data Dialogue



Discussion Draft
Washington, D.C.
October 23, 2015

Today's Agenda

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Introductions

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Participants (1/2)

Federal Reserve

Board – Information Technology/Statistics	Kassandra Quimby, Virginia Wall, Langston Shaw, Laura Stash
Board – Banking Supervision and Regulation	Nawsheen Rabbani, Phillip Basil, Laura McGaughey, Laurie Priest, Cynthia Ayouch
Board – Office of Chief Data Officer	Michael Kraemer, Nuha Elmaghrabi, Richard Palmer
Board – Legal	Benjamin McDonough, Julie Anthony
Federal Reserve Bank of New York	Ken Lamar, Brian Osterhus
Federal Reserve Bank of Philadelphia	Larry Cordell

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Participants (2/2)

Reporting Banks, FSR, Advisers

Steven Brazzell; Jacob Stone	Ally Financial
Amy Eccleston, Bria Smith, Melvillise Rivera, Binwant Wallia	Bank of America
Randy Nissen; Cindy Vasicek	Bank of the West
Craig Riffe	BB&T
Andrew Busby	BBVA Compass
Kent Luken	BMO Harris Bank
Gi Lee	BNP Paribas
Matti Jalakas; Jason Weisman, Caitlin Connell	Citigroup
Mark Fontana	Comerica
Mike Deckert	Fifth Third Bank
Terence Donnelly	Goldman Sachs
Thomas Ricigliano; David Zolnowski	M&T Bank
Denise Pleck	Morgan Stanley
Mohammad Jafar	MUFG Union Bank
Baker Cannada	Regions
Eleanore C. Anderson Bell; Timothy Dexter; Charles Harris	TD Bank
Ben Etzkorn; Jim Flaa	US Bank
Bo Bika; Amy Dorn; Mingming Jang; Rowdy Jones	Wells Fargo
Shannon Drago; David Lapadat; Kristopher Roets; Kevin Thurgood	Zions
Rich Foster; Robert Hatch	Financial Services Roundtable
Ken Cassidy	Protiviti
Jim Sivon	Barnett, Sivon & Natter
Greg Wilson	Wilson Consulting

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Goals and Objectives

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Common Goals

We share one common goal

The continuing goal of this FSR FR Y-14 Data Working Group and Federal Reserve dialogue is to enhance the quality and integrity of risk reporting data submitted to the Federal Reserve and meet the evolving data needs in a responsive, efficient, and risk-sensitive way.

- The collection, analysis, validation, and reporting of accurate risk reporting data is an ongoing, iterative, and evolving process among finance and treasury groups, risk management, and information technology groups at reporting banks as well as between the banks and the Board.
- Enhancing the current process and working collaboratively through constructive and regular engagement on issues of mutual concern will yield benefits to both the Federal Reserve and reporting banks.

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Objectives of today's meeting

- Continue the collaborative dialogue on issues of mutual interest identified in the current FR Y-14 data submission process and recommended improvements.
- Clearly communicate our priority concerns to the Federal Reserve:
 - Continue to reduce the frequency of changes to the FR Y-14 schedules; and
 - Allow a minimum of **6 months** between finalization of reporting and technical requirements and the effective reporting date of the schedule(s) impacted by the requirements.
- Review and discuss the status of specific, actionable recommendations to improve the FR Y-14 reporting process, including progress to date, additional considerations, and immediate/practical solutions for:
 - Improving Communications;
 - Edit Checks;
 - Process Improvements/Timing; and
 - Inconsistencies.
- Discuss the new proposed changes, including the new attestation requirement.
- Discuss next steps for the FIs and the Federal Reserve.



Status Review and Discussion of Specific Recommendations

Improving Communications

David Zolnowski and Tom Ricigliano



Theme #1: Improving Communications

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Advanced Notice of Proposed Schedule Changes	Engage the Bank Holding Companies (BHCs) earlier in the planning process when changes to FR Y-14 reporting are being considered.	Revised recommendation. Meetings were held in early 2015 regarding proposed changes in the FR Y-14M schedules. We believe these were productive and will lead to a smoother transition of the changes proposed that are effective 12/31/15.	None.	Continue upon the success of the 14M and expand to all other schedules as well.
Calendar	Develop and maintain a calendar to inform BHCs of filing due dates (e.g., final instructions, FAQs, publish dates), as well as expected deadline for FRB to provide updates to technical specifications and FAQ documents. This calendar should also incorporate meetings for discussion of changes in schedules (previously discussed). New / revised instructions should be published on the dates established per the calendar.	No progress to date.	None.	Agree or Disagree that this is a viable option. If viable, establish an implementation date and put into practice.

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Improving Communications

David Zolnowski and Tom Ricigliano



Theme #1: Improving Communications

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Reporting Instructions and Technical Specifications	<p>Publish technical specifications (Data Dictionary, XSDs, Edit Checks, XML templates, etc.) in tandem with proposed or final reporting instructions in order to:</p> <ul style="list-style-type: none"> Give BHCs the opportunity to review new or revised guidance as a whole, identify any potential conflicts or inconsistencies, provide feedback and/or seek clarification in a timely fashion. Give technology resources at BHCs a chance to be proactive. <p>Reporting instructions should incorporate other forms of published guidance, such as citing specific FAQs that are both relevant and resolved, or updating the instructions to include that guidance.</p> <p>All forms of published guidance and reference materials should be version-controlled to facilitate clear and easy Q&A between BHCs and FRB/POC.</p>	<p>Revised recommendation. No progress to date.</p> <p>BHCs continue to receive new and/or revised technical specifications on a lag versus the reporting instructions. This often occurs late in the reporting cycle, as an example, for the FR Y-14Qs, on 7/13 and 8/5 for 2015 Q2 due on 8/17, or for FR Y-14A DFAST, on 5/20, 6/15 and 6/29 for 2015 Q1 due 7/6.</p> <p>FRB has begun centralizing FAQs on IntraLinks.</p> <p>FRB has implemented version controls within the technical specifications.</p>	<p>BHCs have found inconsistencies between technical specifications and reporting instructions which have caused confusion and increased Q&A. This can lead to rework.</p> <p>Ensure all guidance is provided to BHCs as soon as it becomes available.</p>	<p>Understand why there is a lag in publishing technical specifications.</p> <p>Explore ways to improve the current process to align the publication dates of reporting instructions and technical specifications.</p>

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Improving Communications

David Zolnowski and Tom Ricigliano



Theme #1: Improving Communications

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Effective and Efficient Way to Obtain Clarification on Reporting Instructions	<p>Determine a way to enhance communication between the Fed and BHCs to obtain clarification on reporting instructions, suggestions could be:</p> <ul style="list-style-type: none"> • Direct contact to the Individual Fed SMEs for each portfolio. • Periodic meetings between SMEs and BHCs for clarification. • Enhancements to FAQ process, including: <ul style="list-style-type: none"> ○ More transparency in process. ○ Tracking numbers provided, and direct access to real-time status. ○ Mutually agreeable Service Level Agreements (SLAs) for response. ○ Searchable database for FAQs to look for previously submitted questions. ○ Ability to send a confidential FAQ. 	<p>Revised recommendation.</p> <p>Minor improvements in FAQ process to date.</p>	<p>There is a feeling in the industry that the decrease in FAQs submitted does not necessarily signal that the FR Y-14 process should be considered "mature", but rather shows a lack of confidence in the current FAQ process.</p>	<p>Continue to work together to find a solution to better enhance communication.</p>

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Improving Communications

David Zolnowski and Tom Ricigliano



Theme #1: Improving Communications

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Submission Confirmation	<p>FRB/Point of Contact (POC) should confirm receipt of all files submitted by BHCs, particularly:</p> <ul style="list-style-type: none"> • Upon receipt of FR Y-14 submission files. • Upon determination that submission files were loaded successfully to the FRB system. • Upon receipt of BHC's Respondent Edit Report (RER) files. • Upon determination that BHC's RER files were loaded successfully to the FRB system. • Upon determination that FRB has reviewed all RER files and no further action is needed for the reporting period. 	<p>Revised recommendation.</p> <p>Unless FRB/POC is advised by BHC to look for recently submitted files in IntraLinks, there is no communication beyond an IntraLinks update log which is provided to BHCs after the upload completes.</p>	<p>Confirmation process should apply to any and all files that FRB receives from BHC.</p> <p>An automated process, similar to that used for e-filing income tax returns, could provide BHCs a confirmation and also provide a status, for example, "Accepted / Conditionally Accepted / Pending Successful Load to FRB / Pending Syntax Edits / Pending Review".</p> <p>POC should also manually confirm receipt of documents sent via FR Secure Message Center.</p>	<p>Institute an automated process to provide BHCs instantaneous confirmation (possibly with current status) that their FR Y-14 deliverables have been received.</p> <p>FRB/POC feedback should be instantaneous and at a minimum indicate file name, file date and time, file size (KB), etc. and confirm that the file hand-off occurred without incident.</p>

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Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Request for Commentary	Formalize the inclusion of technical instructions, including the data dictionary, edit rules, and XSD, for any commentary period that materially changes the FR Y-14 series of reports. This would allow the industry to provide appropriate feedback on feasibility and burden incurred with such proposed changes and decrease probability for edit check issues.	No progress to date.	None.	Data dictionary, edit rules, and XSD should be presented in a draft state to reporting banks for feedback during the formal commentary period for material changes to the FR Y-14 series of reports.



Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Test File Load	For the FR Y-14Q and FR Y-14A: <ul style="list-style-type: none"> Federal Reserve environment should open 15 days before the submission due date to allow for test submissions. Test submissions are loaded and all edit checks are run against the test submission. All edit results are returned to the BHC within 24 hours of a test submission upload. The number of test submissions, the amount of edit fails, and any data anomalies within the test submission should not have any negative bearing on an institution's quantitative or qualitative results. 	No progress to date.	Advantages/Gains: <ul style="list-style-type: none"> Allows for best possible submission, in terms of quality, on the date the submission is due. Provides the Federal Reserve a QA process/resource on newly defined edit checks as institutions are able to comment on unexpected/incorrect edit checks and the Federal Reserve can correct these edit checks before the submission due date. Saves institutions a considerable amount of resources and time by providing this functionality. For example, BlackKnight currently offers this same functionality for the FR Y-14M. The cost of this is \$8,000 per month with a onetime set up fee of \$8,000. Other more comprehensive vendor options are available for the FR Y-14Q and FR Y-14A that are significantly higher in cost. 	Agree or Disagree that this is a viable option. If viable, establish an implementation date and put into practice.



Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Test File Load (Cont.)	<p>For the FR Y-14M:</p> <ul style="list-style-type: none"> Same as previous slide but environment opens 5 days before the submission due date. 	No progress to date.	<p>Possible Fed Concerns and Counterpoints:</p> <ul style="list-style-type: none"> Concern: Provides an institution the ability to conceal inadequate processes and data quality issues. <ul style="list-style-type: none"> Counterpoint: Onsite qualitative meetings after each CCAR provide the Federal Reserve the ability to review processes for robustness and validity. Counterpoint: Detailed Federal Reserve examinations for the FR Y-14Q/M provide the opportunity to review processes and issue findings/observations. 	See previous slide.



Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Enhanced XSDs	Create and distribute enhanced XSDs that should remove the need for all syntax edit checks and reduce the quantity of validity edit checks run against each submission. Institutions should be required to validate against the published XSDs.	No progress to date.	If implemented, a significant amount of FR Y-14 edits can be removed. This will reduce the time and burden on the Federal Reserve required to maintain, distribute, and verify edit check results that are not needed. This would also reduce the burden on institutions to implement and maintain such edit checks as well as respond individually to each edit failure that occurs.	<p>Agree or Disagree to this approach. If in agreement, establish a date for implementation.</p> <p>The FSR will provide a sample enhanced XSD that eliminates the need for 1,923 edit checks for the FR Y-14A Summary schedule.</p>



Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Tolerances	Introduce tolerances/thresholds for any facility/loan level submission similar to what is done for the retail loan schedules on the FR Y-14Ms.	No progress to date.	There are legitimate business/product reasons for triggering edit checks. The internal auditors and external FRB examiners interpret the edit findings as errors while they are not.	Apply thresholds to facility/loan level edit checks, similar to what has been done by Black Knight for the FR Y-14M Mortgage/Home Equity templates.



Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Validity and Scope of Edit Checks	Review the validity and scope of the edit checks to account for situations where the rule(s) should not apply.	Population of edit checks of concern has been provided to the Federal Reserve several weeks in advance of this meeting as requested.	None.	Remove edit checks that are at issue or provide feedback identifying why the edit check should remain.

Process Improvements/Timing

Mingming Jang and Amy Dorn



Theme #3: Process Improvements/Timing

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Pre-Proposal Discussion for Major Changes	Establish a process to proactively solicit BHCs' input and comment on potential major changes in reporting requirements, in order to better understand reporting feasibility and decrease probability of misinterpretation of requirement.	<p>The FRB reached out to this working group for comments in Dec. 2014 on potential Y14Q wholesale schedule changes.</p> <p>In April 2015, the FRB provided a preview of Y14M FL & HE proposed item and solicited BHCs' feedback via this working group.</p> <p>Early high-level notification of 2015 proposal shared during Ask the Fed session in June 2015.</p> <p>In June 2015, the FRB provided a staff proposal for the changes in collection of loan level auto data. A draft data dictionary was provided to solicit BHCs' feedback from general and technical perspectives.</p>	This process can be expanded to include the other Y14 schedules.	Continue to proactively engage industry through this working group for input prior to issuing a proposal for significant instruction requirement changes. This allows the SMEs from the FRB and industry to communicate the business practice and exchange perspectives.

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Process Improvements/Timing

Mingming Jang and Amy Dorn



Theme #3: Process Improvements/Timing

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Inquiries	Establish a standard timeline for resolution for inquiries submitted to FRB. Depending on the complexity or specificity of the subject matter, a recommended timeline would be from 2-4 weeks.	No progress to date.	<p>The new process of distributing FAQs quarterly does not provide accurate lead time to respond to FAQs that may affect an institution. A more frequent schedule for FAQ distribution is recommended (i.e., every 4 weeks).</p> <p>Providing timely clarification on the instruction is essential to the quality of the report and to improve efficiency of report preparation.</p>	Set forth a formal agreement (i.e., SLA) with reporting banks that all inquiries will be responded to in a timely manner (e.g., within 2 weeks) and provide an escalation process for when responses are not received within an agreed upon timeline.

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Process Improvements/Timing

Mingming Jang and Amy Dorn



Theme #3: Process Improvements/Timing

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Changes	<p>Establish an agreed upon timeline for change requests to allow reporting banks adequate time to adhere to standard software development life cycles (SDLC). This includes writing requirements, establishing project timelines, update coding, mapping, validation, scheduling releases to production, testing and changes to affected reporting structures.</p> <p>A recommended minimum of six months or longer from a final rule, especially if changes affect multiple or complex fields, similar to instruction changes for the Y-9C submission. If major structural changes are requested (such as changing the Wholesale 14Q from a facility to a loan level submission or adding a peripheral collateral collection with linkages to the Corporate and CRE 14Q submissions) and significantly longer lead time, such as one year, would be recommended to accommodate these changes as many areas of the bank would need to be involved. (Refer to Appendix A).</p>	<p>A forum was convened to review changes to the Wholesale and Retail schedules.</p> <p>The latest proposal issued in Sep. 2015 has the proposed effective date extended to 1Q2016 for Wholesale Y14Q schedules.</p>	<p>A more clearly defined plan for when (quarter) changes will be effective, in order to enhance transparency into which fields will be required, and dates, in order for BHCs to enhance lead time and quality control.</p> <p>Every request for clarification submitted during the comment period needs to be fully addressed in the final instructions or supplemental documentation allowing BHCs to report their data in accordance with the instructions with clarity.</p> <p>BHCs are concerned about the timing since the FAQ process did not provide resolutions to all questions prior to the filing.</p>	<p>Provide BHCs with adequate timing (i.e., minimum of 6 months from publication of final instruction) to implement changes, this includes providing advance notice to BHCs when there will be changes/revisions.</p>

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Process Improvements/Timing

Mingming Jang and Amy Dorn



Theme #3: Process Improvements/Timing

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Acquisitions and Historical Data	<p>Consider good faith efforts by BHCs in populating static and/or historical data on acquired portfolios and grant exemptions on data gaps as appropriate. The information systems of acquired portfolios tend not to house all of the attributes required for CCAR reporting.</p>	<p>Updated recommendation.</p>	<p>Define the requirement for BHCs (non-first time filing companies) providing historical data on acquired portfolios to the data available in the acquired portfolio.</p>	<p>Formalize a process to incorporate historical data from acquisition into the edit check process.</p> <p>Provide clarity on the requirements for reporting of historical data (i.e. Net Operational Income at Origination, Value at Origination, etc.)</p>
Concurrent Specification Changes	<p>Consider all components of a change holistically so that updated rules or instructions are provided and agree with their technical specifications and edit checks.</p>	<p>No progress to date.</p>	<p>Consider establishing a standard 14A edit check fail response timeline which is consistent with time necessary to report edit rule failures to the BHCs. Recommend a 2 business day response window.</p>	<p>Ensure consistent information is provided across various instructions and documents.</p> <p>Lengthen the response time for the 14A edit check fails to 2 business days.</p>

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Theme #4: Inconsistencies

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Data Dictionary	Establish FR Y-14 data dictionary leveraging industry standards (e.g., MISMO / FHA). This appears to be occurring with the introduction of the 14A XML MDRM; however, the consolidation of how schedule data points are referenced needs to be considered (e.g., 14A Summary Schedule MDRM vs. 14Q PPNR technical codes vs. 14QPPNR line item codes vs. 14Q Retail schedule column names).	No progress to date.	Include data dictionary in all proposed instruction changes. This should be produced in a draft state so that BHCs can provide feedback to its accuracy.	Enhance usage of MDRMs across all schedules. Coordinate with other regulatory agencies to ensure consistency for common data elements and consolidate those data elements into one data dictionary. Establish consistency across data dictionary for Y-14Ms, Qs, and As.
Coordination	Collaborate and coordinate with other bank regulators / Office of Financial Research to determine standardized file formats for data submissions across the bank regulatory agencies.	No progress to date across all regulatory agencies; however, all FR Y-14Q technical instructions have been consolidated into one document.	Continue to emphasize the coordination with other regulatory agencies.	Improve coordination with other regulatory agencies which request similar, if not the same, data. For example, FRB and FDIC / OCC coordination on CCAR / DFAST submission file formats (XML vs Excel). Number of technical instructions should be consistent quarter-to-quarter to ensure consistent reporting standard.



Theme #4: Inconsistencies

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Use of XML	Extend the use of the XSD and require all BHCs validate against the XSD before submitting their data.	No progress to date.	Approximately 6,000 edit checks (~80% of all 14A/Q edits) can be implemented within the XSD to ensure that the FRB receives data in the appropriate and expected format. This would also reduce personnel and system resource consumption at the FRB and at BHCs. (Refer to Appendix B)	Extend the usage of submission XSDs, requiring all BHCs to validate against the XSD before submitting their data; data types / restrictions; enumerations; max / min values; patterns.



Preliminary Feedback Regarding Proposed Changes

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Proposed Changes

Proposed Changes: Preliminary Feedback for Discussion

- FSR Comment Letter: In-process with an estimated submission by November 16, 2015.
- Timing of Changes: Request for a minimum of 6 months for implementation after final rule.
- Socialization of Changes: Socialization of proposed changes with industry for feedback.
- Specific Discussion Items (Note that additional detail on the below topics may be shared during this meeting based on further review and discussion by the attending financial institutions):
 - Attestation requirement;
 - Edit checks provided in advance;
 - Reporting of pipeline syndications;
 - Dispositions of corporate loans;
 - Changes to 14A schedule; and
 - Changes to C&I and CRE schedules.

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Next Steps

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Next Steps

- Schedule and agree on dates for remaining quarterly meetings between the Federal Reserve and FSR FR Y-14 Working Group to continue the dialogue on issues surrounding FAQs, edit checks, timing, and inconsistencies that have been previously identified. Reminder of top two reporting bank priorities:
 - Continue to reduce the frequency of changes to the FR Y-14 schedules; and
 - Allow a minimum of **6 months** between finalization of reporting and technical requirements and the effective reporting date of the schedule(s) impacted by the requirements.
- Agree with the Federal Reserve to work on next steps around the recommendations for improving the edit checks discussed and previously provided in the Excel template.
- Discuss need for interim conference calls on targeted issues for deeper dives (e.g., resolving edit check issues, auto loan data collection, individual schedules).

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Appendices

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Appendix A: SDLC Timeline

SDLC process to systematically update reporting processes may take up to one year to fully implement depending on the request, system capabilities, and resource constraints.

Summary of Project:

Produce a single counterparty gross credit exposure report using a specific data metric

Challenges in SDLC:

- New configuration impacted current reports in production
- Configuration updates affected Risk Reporting Asset Category Codes
- Hard-coded logic had to be replaced with automatic configuration
- Configuration flags for all outbound processes had to be consolidated
- Facility Limits previously reported by Facility Owner Customer were updated to be reported by Primary Customer
- Configuration had to be updated to include data for Credit Default Reporting

Note: The SDLC process varies dramatically for less and more sophisticated changes; actual timelines may range from three months to one year or more.

Gross Credit Exposure - SDLC Timeline

Phase / Objective	Time Required (Weeks)
Receive Request	
Planning Phase	4
Project definition	4
Write Business Requirements and Obtain Sign-off	6
Write Technical / Systems Requirements	10
System Build / Coding and Ongoing Clarification / System Testing	6
User Acceptance Testing	5
Approval and Deployment / Go-Live	5
Quality Control / Parallel Run	12
Total	52

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Appendix B: XSD Enhancement



The following are edit checks that can be moved into XSD (pre-submission validation).

Collections	Schedule	Syntax	Validity	Total
FR Y-14Q	Balance	176	0	176
	Counterparty	0	0	0
	FVO / HFS	46	0	46
	MSR Valuation Schedule	0	0	0
	OpRisk	29	33	62
	PPNR	288	474	762
	Regulatory Capital Instruments	51	38	89
	Regulatory Capital Transitions	348	149	497
	Retail	244	19	263
	Securities	43	29	72
	Supplemental	116	0	116
	Trading	0	0	0
	Wholesale	170	151	321
FR Y-14A	Summary	1877	1424	3301
Total				5705

Attachment B

FSR-Federal Reserve FR Y-14 Working Group Meetings
October 23, 2015
Washington, DC

<u>Name</u>	<u>Bank</u>	<u>Oct. 23 Federal Reserve meeting</u>
IN PERSON		
Jacob Stone	Ally Financial	1
Steven Brazzell	Ally Financial	1
Amy Eccleston	Bank of America	1
Bria Smith	Bank of America	1
Melvelisse Rivera	Bank of America	1
Binwant Walia	Bank of America	1
Cindy Vasicek	Bank of the West	1
Randy Nissen	Bank of the West	1
Craig Riffe	BB&T	1
Andrew Busby	BBVA Compass	1
Kent Luken	BMO Harris Bank	1
Gi Lee	BNP Paribas	1
Caitlin Connell	Citigroup	1
Matti Jalakas	Citigroup	1
Jason Weisman	Citigroup	1
Mark Fontana	Comerica	1
Mike Deckert	Fifth Third Bank	1
Terence Donnelly	Goldman Sachs	1
Dave Zolnowski	M&T Bank	1
Tom Ricigliano	M&T Bank	1
Denise Pieck	Morgan Stanley	1
Mohammad Jafar	MUFG Union Bank	1
Alexandra McKim	PNC	1
Charles Harris	TD Bank	1
Eleanore C. Anderson Bell	TD Bank	1
Timothy Dexter	TD Bank	1
Amy Dorn	Wells Fargo	1
Bo Bika	Wells Fargo	1
Mingming Jang	Wells Fargo	1
Rowdy Jones	Wells Fargo	1
David Lapadat	Zions Banc.	1
Kevin Thurgood	Zions Banc.	1
Kristopher Roets	Zions Banc.	1
Shannon Drage	Zions Banc.	1
Ken Cassidy	Protiviti	1

Rich Foster	FSR	1
Robert Hatch	FSR	1
Jim Sivon	Barnett, Sivon, Natter	1
Greg Wilson	Wilson Consulting	1
Total		39
BY PHONE		
Shelley Johnson	Huntington	1
Baker Cannada	Regions	1
Vivian Zhou	AMEX	1
Jim M. Castro	AMEX	1
David J. Hoberman	AMEX	1
Avi Bhattacharya	AMEX	1
Athanasios Satrazemis	AMEX	1
Diana Blevins	BMO Harris	1
Tom Zingalli	Morgan Stanley	1
Anna Yu	Morgan Stanley	1
Angela Shen	Morgan Stanley	1
Matthew A. Reece	Northern Trust	1
Ben Etzkorn	US Bank	1
Jim Flaa	US Bank	1
Total		14