

**FR Y-14 A and Q Industry Outreach Call
Between Federal Reserve Staff and Representatives of SunTrust
October 21, 2011**

Participants: Andrew J Felton, Benjamin W McDonough, Eric Caban, Kimberly A DeTrask, Lisa H Ryu, Martin Lord, Nancy Beebe, Frank Mayhew, Robert F Sarama, Sabina Golden and Christin Patel (Federal Reserve Staff)

Jennifer Knight, Jim Sproull, Sean Sievers, Stan Cover, Jim Stoker, Melanie Heeder, Kent Kienitz, Ellen Koebler, Paul Burdiss, Tom Panther, Paul McIvey (SunTrust)

Summary: Federal Reserve staff participated in an outreach call with representatives of SunTrust in order to address technical and/or clarifying questions submitted by the firm related to the FR Y 14 A and Q data schedules proposed by the Federal Reserve Board and to solicit feedback on the proposal. Federal Reserve staff did not respond to substantive comments raised by the participants during the call. A summary of the questions raised by the participants is provided below.

Q: Expected use of the PPNR Metrics Template historical data by the financial institution. How should firm take this into account in the forecast process? What is the rationale? Some of the historical data may be challenging to provide in timeframes specified. Specific examples will be provided by firm via email.

A: Substantive comments cannot be responded to during the comment period. SunTrust has the following requests for clarification on the PPNR Metrics Template FRY 14Q

Q: Investment Banking detail, lines 9-23 on the PPNR Metrics Worksheet, what is the standard on defining the market to calculate market share?

A: Under the current proposal, the market share would be defined as a percent of a global market defined as the total dollar volume of deals. SunTrust has the following requests for clarification on the Retail Mortgage Repurchase Template Section III C of FRY14-A

Q: FRY14A 2011-09-07 – section III C: Please confirm that loans sold to GSEs, securitized loans and whole loans sold are based on nature of the transaction when the loan was sold by The Company and does not change based on any subsequent transactions by the original investor. If this is not the intent, please clarify how to classify sold loans into these categories. In doing so, please note that The Company does not have information related to subsequent transfers when the loan is sold servicing released.

A: Under the proposal, the reporting should be based on the nature of transaction when sold by the BHC.

Q: FRY14A 2011-09-07 – section III C: Some of the data requested assumes that The Company has access to all the loan level details to support this measure. Where The Company no longer retains servicing rights on a mortgage loan, The Company does not have, nor is it entitled to the data that would support this measure. Please clarify that we would exclude such mortgage loans from this submission? The only information still available on these loans is the original sold characteristics.

A: Substantive comments cannot be responded to during the comment period.

Q: FRY14A 2011-09-07 – section III C: Please clarify the meaning of vintage: vintage of sale or vintage of origination of loan?

A: Substantive comments cannot be responded to during the comment period.

Q: FRY14A 2011-09-07 – section III Delinquency Status (bullet “b”-Current, Previously Delinquent): Please clarify that the terms “previously delinquent” and “past due” have the same meaning as “past due” as defined in the FFIEC Call Report Instructions, Schedule RC-N, which states “Closed-end installment loans, amortizing loans secured by real estate, and any other loans and lease financing receivables with payments scheduled monthly are to be reported as past due when the borrower is in arrears two or more monthly payments.” If this definition is not consistent with your intent, please provide a definition of the terms “previously delinquent” and “past due”.

A: Substantive comments cannot be responded to during the comment period.

Q: FRY14A 2011-09-07 – section III Delinquency Status (bullet e- Past due 90+ days): We note that “Past due 90+ days” includes all loans that are 90 or more days past due and have not yet been fully charged-off. Please clarify whether or not loans that “have not yet been fully charged-off” includes foreclosed loans that we continue to service all the way through property liquidation. Please note that many repurchase requests relate to loans that are no longer serviced by us because (i) we do not service foreclosed loans for many of our investors, or (ii) the loan has been paid-off through a short sale transaction. Please confirm that these loans should not be included in the requested data.

A: Substantive comments cannot be responded to during the comment period.

Q: FRY14A 2011-09-07 – section III: Net Credit Loss Realized to-date: Please note that for many investors, including the GSEs and GNMA, servicing responsibilities, including property liquidation, are transferred to the investor after foreclosure occurs. In these situations, the investors are not required to send us information on the loans after foreclosure. As a result, The Company (and potentially more broadly for the industry) does not have the ability to provide Net credit Losses Realized to-date for most of the loans serviced for others.

A: Substantive comments cannot be responded to during the comment period.

Q: FRY14A 2011-09-07 – section III : Estimated Lifetime Net Credit Losses: For reasons outlined in the prior point, we don't have historical information to forecast a net credit loss over the lifetime.

A: Substantive comments cannot be responded to during the comment period.

Q: Firm requests definition for Net Credit Loss over the lifetime.

A: Substantive comments cannot be responded to during the comment period.

General Comments for FRY 14Q 2011-09-07 Historical Retail Templates

Q: In the first CCAR, carrying value was requested. Please confirm that for the purpose of this round of CCAR the unpaid balance is requested. Please note that the Y9-C reports in carrying value.

A: Under the proposal, the form would require unpaid principal balance and cumulative interim write downs.

Q: The requested field bands of segmentation are different across the templates, e.g. FICO & Delinquency segmentation is different between Mortgage and HELOAN, even though HELOAN 1st will fall under Mortgage. Is this intentional as in CCAR I they were aligned requiring only one code.

A: Substantive comments cannot be responded to during the comment period.

Q: There is a field in most schedules called "Adjustment Factor to Reconcile, \$ GCO to NCO" (for example B.17 on the Auto Schedule). Please clarify expectation for this field as we are under the impression that NCO will always be GCO less Recoveries, by definition.

A: Substantive comments cannot be responded to during the comment period.

Q: There does not appear to be a mechanism for accounting for missing segments in the history tables. Exclusion tables only apply to the current month. How should we handle recognizing missing historical data to allow for reconciliation? For example, there is no way to capture our guaranteed mortgage historically.

A: In the proposal, for those with missing historical FICO and LTV, history is not requested, only table D is required.

Q: There is a concern about any discrepancies in a historical review.

A: Substantive comments cannot be responded to during the comment period.

1st LIEN MORTGAGE SCHEDULE

Q: Please confirm that the mortgage delinquency definition is OTS as there is no 1-29 DPD bucket.

A: Under the current proposal, the mortgage delinquency term includes current accounts plus accounts 29 days past due.

Q: There does not appear to be an allowance for Loans Owned / Serviced for Others. Please indicate whether we should exclude Sold Serviced for Others. In

CCAR 2010 there was a disconnect between the summary which included only owned loans and the segmentation file which included both owned and Serviced for Others.

A: The proposal does not request service portfolio data.

Q: # of Subprime Accounts (C.2.) – What is the definition of subprime? Is the legacy FICO<620 still applicable?

A: Substantive comments cannot be responded to during the comment period.

Q: # Accounts Repurchased from GSE / Privates (C.6. & C.7.) – Is this ever repurchased or only for most recent month since it is in Table C?

A: Under the proposal cumulative data would be requested.

Q: Verify that exclusions by way of definition should be handled in a separate table vs. allowing a missing band in segmentation. Is it understood that by handling the exclusion through a table, between 5-8% of mortgage volume and 2-3% of HELOAN volume will not be reflected historically.

A: Substantive comments cannot be responded to during the comment period.

HELOC SCHEDULE

Q: \$ Commitment Increases / Decreases (B.7. & B.8.) – Is the goal to capture only new commitments or are you looking for drawn volume? E.g. if commitment stays the same but borrower draws, will this value be 0?

A: Under the proposal, the expectation would be that commitment increases or decreases will be captured.

Q: \$ Commitments (B.4.) – For frozen lines, should this be UPB or 0?

A: Substantive comments cannot be responded to during the comment period.

US Bank Cards and Charge Card Schedule

Q: \$ Commitments (B.4.) – For frozen lines, should this be UPB or 0?

A: Substantive comments cannot be responded to during the comment period.

Q: \$ O/S for 0% Utilization – What is the objective of this field? Our impression is that this would always be 0, in other words how could there be positive outstanding with 0% utilization?

A: FRB will respond via email.

STUDENT LOAN SCHEDULE

Q: Origination Vintage (A.2.) – Do we need bands for segmentation similar to the other schedules? (We have data that goes back a very long period of time).

A: Substantive comments cannot be responded to during the comment period.

Q: Please confirm that only originated loans and not purchased loans are captured in \$ Outstanding New Originations (B.6.).

A: Substantive comments cannot be responded to during the comment period.

Q: Did you intend to have no exclusion table for this section? Excluded accounts, in HELOC section there is a table D, excluded accounts.

A: Substantive comments cannot be responded to during the comment period.