

**FR Y-14 A and Q Industry Outreach Call  
Between Federal Reserve Staff and Representatives of Key Corp.  
October 18, 2011**

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Manny Steffas, Bob Kula, Chip Clarke, Dennis O'Neill, Gibby Bittman, Lou Raffis, Joe Vayda, Melissa Werner, Debbie Stipkovich and Bonnie Cybulko (Key Corp.)

**Summary:** Federal Reserve staff participated in an outreach call with representatives of Key Corp. 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 issues raised by the participants is provided below.

Q: How would we populate templates in a way that incorporates multiple dimensions and allows for multidimensional inputs? Templates are relatively one dimensional. If there is not a way to incorporate more than one dimension can the FRB provide any guidance on how to populate the schedules?

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

Q: Is there a process for an expedited regulatory review of a new scenario not included in our 14A that is a revision of an earlier submitted 14A document?

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

Q: The June Proposed guidance on Stress testing and Capital Planning stated that BHC's must submit annual capital plans. Should these plans be submitted along with the FRY 14A templates like the 2010 CCAR? Please describe the relationship to these processes.

A: The Federal Reserve would provide guidance on the relationship between the proposed templates and the proposed capital plan rule before requiring any final templates.

Q: In the FR Y-9C and FR Y-9LP reports, there are validity, interseries and quality edits for each of these reports. Will there be similar edits for the FR Y-14A/Q? If so, are these edits available for us to review? Also, typically box IDs are assigned to regulatory reports. Will box ids be assigned in the FR Y-14A/Q?

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

Q: How is weighted average maturity to be calculated?

A: Under the proposal, it would be based on expected maturity.

Q: Do the Metrics by Segment on the PPNR Metrics worksheet need to be projected for all scenarios?

A: Under the current proposal, all metrics by segment on the PPNR metrics worksheet would need to be projected for all scenarios. There are some exceptions. As indicated in the instructions, certain elements would be required only for BHCs that would be required to complete the Net Interest Income Worksheet. Additionally, certain requested metrics are subject to size-dependent "triggers" as detailed in the footnotes to the schedule.

Q: Under what circumstances would the net interest income worksheet not have to be completed by the firm?

A: This item would not be required if deposits are less than 1/3 of liabilities.

Q: How should fields be completed to indicate that there is no data for this field?

A: Firm would populate field with a zero (0).

Q: Can the FRB clarify the definition of treasury services and interest rate spreads.

A: Under the current proposal, treasury services would be defined as cash management, global payments (including commercial card), working capital solutions, and trade finance for business, corporate, and institutional clients.

Q: Line 46 avg. interest rate spread (seems like asset liability measure).

A: Under the proposal, this metric would measure spread between IR on loans and IR on deposits.

Q: No loans provided through treasury segment - most of treasury services exist with lines of businesses - treasury services is a project management team- what is being asked is a challenging measure to provide.

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

Q: Please provide clarity on the definition of "Other" on line 66 of the PPNR Metrics tab of the PPNR template.

A: This item would correspond to line item 6c, referenced in net interest income schedule.

Q: The Federal Register makes reference to a qualitative questionnaire (Vol. 76 Page 55291). What is the qualitative questionnaire and when will it be provided to the BHCs?

A: The qualitative questions in the proposed Summary Schedule Instructions are intended to be representative of the nature of qualitative questions that would be asked.

Q: Is it acceptable to submit a blank for charged off loans or do we need to show the last delinquency status before charge off occurs?

A: Under proposed rule firms would be required to provide data for those fields as proposed.

Q: Can last year's submission be leveraged for historical data?

A: All data would be reported as described in the proposed schedules. Substantive comments cannot be responded to during the comment period.

Q: Should marine and recreational vehicles be included with auto data?

A: Under the proposal, they would be included in the auto schedule.

Q: Please provide an exact product definition for U.S. small business and U.S other consumer.

A: For the purposes of the proposed templates, other consumer loans would be defined as those included on line items 6b and 6d of schedule HC-C of the FR Y9-C, excluding student loans.

Q: Firm expressed concerns related to the separation of home equity loans for small business purposes.

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

Q: Expectations for supplemental documentation, proposal seems like it is similar to FR Y-9c data collection. How will the firm provide documentation of assumptions?

A: Under the proposed rule no additional documentation would be required.

Q: If a data field is listed as optional then a firm is not required to submit data for this field, correct?

A: Any fields listed in the proposed schedules would be optional.

Q: Internal MIS relationship based; are schedules divided by product lines? Firm requests clarity on where those items that may cross over should be reported. PPNR, net interest income, home equity loans may cross portfolios.

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

Q: When will macro scenario be made available to firms?

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