FR Y-14 A and Q Industry Outreach Call
Between Staff of the Federal Reserve, Office of the Comptroller of the Currency,
Federal Deposit Insurance Corporation, State Bank Regulatory Staff and
Various Industry Participants
October 18, 2011

Participants: Adam Pilsbury, Alexander J Psomas, Alye S Foster, Amy Z Berardinelli,
Andrew J Felton, AnnMarie Kohlligian, Anulekha Mohanty, Arthur Angulo,
Benjamin W McDonough, Brad Evans, Brendan Murrin, Brian Gordon,
Carl Tannenbaum, Charles F Huling, Charles von Althann, Chris Haley,
Chris Haley, Chris Henderson, Christin Patel, Christine E Graham,
David Johnston, David M Wright, David Tatum, Diann Townsend,
Dianne Dobbeck, Emily Yang, Eric Caban, Frank Mayhew, Gerard F Donovan,
James Barnes, James Nelson, James Wall, Jan Voigts, Jenni M Frazer,
Jeremy Caldwell, Jerrold L Newlon, Jodie Goff, John Beebe, John Pelick,
John Ricketti, Jonathan Polk, Joseph G Peter, Judith A Cass,
Julie Pavek-Olson, Kerri O'Rourke-Robinson, Kevin Stiroh,
Kimberly A DeTrask, Kyu Chay, Laura Duhamel Rogers, LaVerne Cornwell,
Lisa A White, Lisa H Ryu, Lucinda M Brickler, Martin Lord, Michael Alix,
Michael D Coldwell, Michael Koh, Michael R Foley, Michael Shing,
Michael Silva, Michele L Kuhn, Michele Meyer LoBiondo, Michelle E Shore,
Nadine M Wallman, Nicholas Goumas, Patrick J Loncar, Patrick M Wilder,
Paul Whynott, Princeton Rose, Richard Gilbert, Richard Westerkamp,
Robert F Sarama, Rochelle M Edge, Ronald Stroz, Ryan P Lordos,
Sabina Golden, Scott Chastain, Simon Kwan, Sonny Bivins, Steven J Manzari,
Steven M Durfey, Summer Cole, Theonilla Lee-Chan, Theresa Barry,
Tim P Clark, Todd Vermilyea, William Brodows, William Carlucci,
Wing Oon, Seema Shankar, Stacy L Bryant, Brad Curell, Phillip Watts,
Fatima Madhany, John Tarter, George Lee, Peter Basalyga, Bill Gillis,
Christopher Precourt, John Owen and Lorenzo Garza (Federal Reserve Staff)

Kim Scherer, Linda Cunningham, Linda Marquis, Morris Morgan, Richard Taft,
Shawn Reeves, Thomas O'Rourke, TJ Kuwitzky, Linda Furda and Robert Barnes
(Office of the Comptroller of the Currency Staff)

Caren Hibbits, Alfred L. Seivold, Dave Swett, Jeffrey Burgess, John Demaio,
Joshua Kang, Luke Reynolds, Pete Domasky, Rich Gilloffó, Robert Veno,
Tracy Fitzgerald, Kent Bergey, Catherine Needham, Gregory Gaare,
Kevin Bruno, Patrick Mitchell, Ross Waldrop, Bob Feuker, Lynel Rumbutis,
Robert Burns and Jim McGraw (Federal Deposit Insurance Corporation Staff)

J. Merritt, Joel Black, Ann Cathcart, Russell Damitz, and C. Daniel (State
Banking Regulators)

Kevin Murray, Morris Thompson, Vani Yadla, Paul Widuch, Andrew Cecere,
Kurt Swiecichowski, Ken Nelson, Kurt Swiecichowski, Ken Nelson, Bill Parker,

Summary: Federal Reserve staff participated in an outreach call with various industry participants in order to address technical and/or clarifying questions submitted by the firm related to the FR Y 14 A and Q commercial real estate (CRE) data schedule 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. As part of this discussion, agency staff provided a general presentation as a supplement to the meeting invitation. A summary of the issues raised by the participants is provided below.

Q: Should the valuation field in the proposed CRE schedule include only the value of real property securing a CRE loan or can the value of non-real property collateral be included as well?
A: The proposed CRE schedule defines CRE loans as loans reported on form Y-9C under BHCKF158, BHCK159, BHDM1460, BHCKF160 and BHCK161. Proposed Y-14Q CRE schedule field numbers 13 (Value at Origination) and 41 (Current Value) would include the value of CRE collateralizing the reported loan
that result in the loan being classified in any of the above CRE Y-9C line items. The value of collateral that is not CRE would be excluded from fields 13 and 41.

Q: Should the value fields exclude forms of collateral other than CRE? Some loans are collateralized by securities and other sources of repayment. Excluding forms of collateral other than CRE may misrepresent the level of risk.
A: Substantive comments cannot be responded to during an open comment period.

Q: Should the cross-collaterization field include cross-collateralization/cross-default relationships that exist at the quarter end or relationships that existed at origination?
A: Field 43 (Cross Collateralized Loans) of the proposed Y-14Q CRE schedule would include the loan number of only loans that are cross-collateralized or cross-defaulted with the reported loan at the schedule as-of-date. The as-of-date for the first proposed Y-14Q collection would be September 30, 2011.

Q: Providing net operating income (NOI) at origination for some CRE loans may not be possible.
A: Substantive comments cannot be responded to during the comment period.

Q: Is the proposed Y-14Q CRE schedule the same as the schedule used by the Office of the Comptroller of the Currency to collect CRE data from certain national banks?
A: Yes, the proposed Y-14Q CRE schedule would be identical to the schedule being used by the OCC to collect CRE data from certain national banks. Please note, the proposed schedule is out for comment and any final Y-14Q CRE schedule may differ from the current OCC collection.

Q: For banks currently submitting CRE data to their primary federal regulator, should the data requested on the proposed Y-14Q CRE schedule be submitted using the normal report submission process?
A: Yes. For banks that currently report CRE data to their primary federal regulator, the method of submission currently remains the same.