

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 Pavak-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 Gilloffo, 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,

Kathy Rogers, Tony Kelley, Jacob Seljan, Marin Cooney, Melissa Feldsher, Bipasha Majumdar, Shannon Warren, Debbie Smith, Michael Loughlin, Frank Miller, Ravi Mallela, Timothy Sloan, Paul Ackerman, Manny Steffas, Richard Johnson, Bill Parsley, Randy King, Mitch Roberts, Jim Costa, Denise Letcher, Kevin Glass, Glen Sinawski, Dale Buttgerreit, David Shernisky, Robert Beck, Diane Daley, Jason Alfano, Jeff Lynch, Alex McWhorter, Graham Reichelt, Brian Glass, Gunnar Jakobsson, Christopher Spicer, Deron Smithy, Jamie Gregory, Anil Chada, Tim Fleming, Dan Park, Tim Lyons, Vince DiMassimo, Eduardo Canabarro, Peter Cai, Marcelo Cruz, Frank Tredici, Fred Gonfiantini, David Russo, Peter Albero, Phil Blumberg, Kevin Mooney, James E. Sproull, Aleem Gillani, Ellen Koebler, James Stoker, Melanie Heeder, Paul Mangelsdorf, Kent Kienitz, Tu Le, Paul Burdiss, Stan Cover, Dan T Henry, Ashwini Gupta, David L Yowan, Richard Petrino, Bob E Phelan, Mikhail I Dobrolioubov, Margo E Somma, Anderson Y Lee, Stephen J Bakonyi, Sean Leary, Stephen Merritt, Leyla Mertz, Andy Kuritzkes, David Gutschenritter, John Slyconish, Edward Smith, Jim Cowden, Bill Schomburg, Jim Haught, Dale Davies, Michael Stevens, Lloyd Francis, Hal Johnson, Gary Gegick, Brian Rogan, Todd Gibbons, Bruce Thompson, Chris Jones, Jeff Colson, Geoff Greener, Mark Linsz, Neil Cotty, Bob Lynch, Jim Donnellan, Robert Lynch, Josh Esterov, Michael Yick, Lori Evangel, Robert Semke, Marybeth Lukie, Mike O'Connor, Greg Caraynoff, Marlene Debel, John Doherty, Alan Tachikawa, Damien Cranwell, Bob Broseker, Jim Dingler, Joseph Stout, Linda Mehlman, Herman Sabio, Eric Daugherty, Stephanie Foley, Craig Alden, Dale Davies, Mike Stevens, George Malanga, David Clarke, Vic Israni, Mark Wuesterfeld, Jason Arseneault, Tom Flynn, Ernie Bonser, Kevin Cavanaugh, Jim Hills, Robert grabber, John Haley, Tommy Tynes, Jim Haught, Ellen Koebler, Joanne McClatchy, Alan Medearis, Jennifer Knight and Barbara Palazzolo (Various Industry Participants)

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-collateralization 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.