Meeting Between Staff of the Federal Reserve System, Representatives of the Financial Services Roundtable, Representatives of The Clearing House, and Various Industry Participants
July 17, 2017

Participants: Phillip Daher, Zachary Dailey, Nuha Elmaghrabi, Michael Fisher, Michael Kraemer, Tamara Molder, Evans Muzere, Laura Olsen, Richard Palmer, Nawsheen Rabbani, Lisa Ryu, Langston Shaw, and Virginia Wall (Federal Reserve Board);

Larry Cordell (Federal Reserve Bank of Philadelphia)

See Appendix A for a list of industry participants.

Summary: Staff from the Federal Reserve Board and the Federal Reserve Bank of Philadelphia met with representatives and members of the Financial Services Roundtable, The Clearing House, 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
Continuing the FR Y-14 Reporting Dialogue

Discussion Document
Washington, D.C.
July 17, 2017

US Auto Schedule Resubmission and Edit Check Request

Jacob Stone – Ally Financial
David Zolnowski – M&T Bank
US Auto Schedule Resubmission

Problem Statement: Numerous BHCs are required to resubmit schedule A.2 (US Auto) for quarters prior to a narrative instruction change in 2014.

Background: Conflicting verbal guidance has been received by BHCs regarding resubmissions of historical data. Specifically if they should follow the current or historical technical and narrative instructions.

Tactical Concerns:
- Many financial institutions have received guidance contradicting what was believed to be standard practice.
- Historical resubmission (1Q2007 to 2Q 2014) required for Charge-off related fields for the US Auto Schedule (Schedule A2). Some firms interpreted FRB guidance to require institutions to follow current technical instructions but follow historical narrative instructions while other firms understood that current narrative instructions would be followed.

Strategic Concerns:
- Without formally published guidance to clarify these concepts, technology solutions were created to support assumed scenarios (e.g., follow current technical instructions and current narrative instructions). Other scenarios would be manual, laborious, and prone to error.
- The burden to financial institutions involved with these types of request.

US Auto Schedule Resubmission

FSR Recommendations:
- Formally publish a retention period for FR Y-14 data submissions similar to other regulatory reports which require retention for five years after the report date.
- Formally publish guidance on expectations for historical resubmissions outlining the required formats to follow and materiality conditions for when resubmissions should occur.
- On requests like these, when multiple BHCs are involved, coordinate efforts and form more of a “task-force” to resolve. This will help ensure consistent communication between all parties and reduce the level of potential operational concerns.
New Edit Checks Run on Prior Quarter Data

Problem Statement: BHCs have been asked to respond to edit check exceptions related to newly published edit checks which have been run against historical periods.

Background: Edits created in 1Q 2017 for the FR Y-14Q PPNR schedule (Schedule G) were run on historical submission periods and required explanations or resubmissions where necessary.

Concerns:
- Previous verbal guidance has suggested that newly created edit checks would not be run on historical FR Y-14 submissions.
- The burden to financial institutions involved with these types of request.

FSR Recommendations:
- BHCs should not be required to respond to edit exceptions on historical periods, specifically periods that are prior to an edit's Quarter Modified Date (the quarter the edit was last modified).
- Formally publish expectations related to this policy within the Technical Submission Instructions document.
Attestation

Attestation: Summary

- Submissions received were timely and met the requirements.

- Some confusion regarding logistics:
  - the forms and which to use
  - where to submit supporting materials

- Varying levels of supporting documentation received.

- If received (although not required), any additional information provided was clear, relevant, and insightful.
Attestation: Feedback

- For the annual submission, would the consolidated submission of attestation forms at the April 5 date, as collected for 2016, be preferred?

- What about a consolidated due date for the three monthly attestations in a quarter?

- Any other comments or concerns?

FR Y-14 and CCAR FAQ Process Update
What is the FAQ Process?

- The FAQ process allows firms to submit questions to the Federal Reserve to receive further information or clarification regarding the:
  - Capital Plan Rule
  - Comprehensive Capital Analysis and Review (CCAR)
  - Stress Tests
  - FR Y-14 information collection

- The process is not intended to result in the introduction of new requirements or to respond to questions regarding technical matters.

- The Federal Reserve uses separate but similar processes to manage the FR Y-14 information collection, and Capital Plan/CCAR FAQs.

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Question Lifecycle

1. The firm submits a question to their Reserve Bank Analyst, Data Aggregator, or directly to the CCAR mailbox.*
2. The question is then entered into a system that tracks questions and responses.
3. The firm receives a Tracking ID and expected timeframe as confirmation of receipt of the question.
4. Federal Reserve experts review the question and draft a response. Additional information may be requested from the firm.
5. The drafted response is vetted within Federal Reserve.
6. Once all Federal Reserve stakeholders approve response, the question is marked as approved in the system.
7. The point of contact is notified and the response is distributed directly to the submitting firm.
8. Depending on whether the question contains confidential information, the Q&A will be included in the next FAQ publication.

* Depending on whether the FAQ is regarding the Y-14A to Y-14M, Capital Plan or CCAR, the question will have different submission methods.
Upcoming FAQ Process Enhancements

Purpose of the Process
Facilitate the review of questions from CCAR and FR Y-14 firms by Federal Reserve subject matter experts, resulting in the timely dissemination of responses and clarification, as appropriate.

Objective of Enhancements
Increase transparency surrounding, and improve timeliness responding to questions received from firms.

Process Effective Date
Questions received on or after August 1, 2017 will be addressed through the new process.

What is Changing?

<table>
<thead>
<tr>
<th>Current Process</th>
<th>New Process</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Process Name</strong></td>
<td></td>
</tr>
<tr>
<td>FAQs</td>
<td>Q&amp;As</td>
</tr>
<tr>
<td>CCAR mailbox (CCAR, Capital Plan)</td>
<td>No Change</td>
</tr>
<tr>
<td>Designated Reserve Bank or Data Aggregator Contact (FR Y-14 questions)</td>
<td>All Q&amp;As will be made public without redaction or modification, unless a firm requests confidential treatment and provides a written justification for the request pursuant to the Board’s rules regarding availability of information</td>
</tr>
<tr>
<td><strong>Submission Process</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Confidential Treatment</strong></td>
<td></td>
</tr>
<tr>
<td>Questions that the Federal Reserve or firm deems “firm-specific” are not published; justification is not required</td>
<td></td>
</tr>
</tbody>
</table>

Public / Official Release
### What is Changing?

<table>
<thead>
<tr>
<th>Current Process</th>
<th>New Process</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Publication Location</strong></td>
<td>Federal Reserve’s Public Website and IntraLinks</td>
</tr>
<tr>
<td><strong>Publication Frequency</strong></td>
<td>Monthly (Public Website) Weekly (IntraLinks), Ad hoc (as needed)</td>
</tr>
<tr>
<td><strong>Publication Content</strong></td>
<td>Q&amp;A ID Category* Submitting firm name Original question Response Date added</td>
</tr>
<tr>
<td><strong>Publication Format</strong></td>
<td>HTML, PDF</td>
</tr>
</tbody>
</table>

*For FR Y-14 questions this includes report, schedule, and sub-schedule.

### Other Items to Note Regarding the Publication

- The Q&A report on IntraLinks and the public website will each have a different look and feel but both will contain the same information.

- Questions received prior to August 1, 2017, will not be subject to the new process.
  - The FAQ report will be maintained on IntraLinks and updated until all questions received prior to August 1, 2017 are closed.
  - If a prior FAQ is referenced in the current Q&A report, it may be added to the publication.

- For CCAR Q&As, the Q&A IDs will “restart” with the new publication.
Additional FR Y-14 Q&A Changes

- The timeline for receiving responses to FR Y-14 questions will be reduced.
- A template for submitting FR Y-14 Q&A questions, similar to that currently used for CCAR questions, will be distributed to assist firms in submitting the appropriate and necessary information.

Information Necessary for Submission of Q&A

The following information is necessary to ensure proper routing of questions and receipt of responses:
- Firm Name
- Contact Name, E-mail, and Phone Number
- Classification of Question
  - FR Y-14: Report, Schedule, Sub-Schedule
  - CCAR: Category
- Question
- Confidentiality Requested? (Yes/No)
- If yes, justification for confidentiality request

Please keep in mind the public nature of questions submitted as Q&As. Information will not be redacted and may be released if confidentiality is not requested.
Details of Confidential Treatment Request

- Each question and response will be made available to the public unless the information contained in a question or response falls, in whole or in part, within the scope of one or more of the Freedom of Information Act (FOIA) exemptions from disclosure.

- A firm must request confidential treatment in writing concurrently with its submitted question pursuant to the Board's rules regarding availability of information.

- Information for which confidential treatment is requested may subsequently be released by the Federal Reserve System pursuant to the Board's rules if the Board determines that the disclosure of such information is in the public interest.


Public / Official Release

Edit Check Update
Edit Check Update

- Review of FSR FR Y-14 Edit Check Review
  - Major Themes and Responses
  - FR Y-14A Summary
  - FR Y-14Q Summary
- 2017 Initiative: FR Y-14 Edits and Remarks Analysis group
  - Edit Analysis Purpose
  - Edit Analysis Criteria
  - Milestones and Next Steps

FSR FR Y-14 Edit Check Review: Major Themes

<table>
<thead>
<tr>
<th>High Level Justification / Explanation</th>
<th>High Level Recommendations</th>
<th>High Level Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continue to receive edit checks on items intentionally submitted as null.</td>
<td>When Bank states which line items intentionally null as do not apply, should not continue to receive edits during subsequent stress cycles.</td>
<td>Reserve Bank analyst are committed to thoroughly reviewing previously submitted responses and where applicable asking firms to confirm previously provided responses.</td>
</tr>
<tr>
<td>24: Continue to receive edit checks on items intentionally submitted as null - specifically being cited for null errors on projection quarter 1Q+ which is only collected on repurchase sub-schedule.</td>
<td>Nut errors should not be cited on projected quarter 1Q+ for data elements not related to the repurchase sub-schedule.</td>
<td>Board Statistics have evaluated edits and where applicable have archived or amended edit logic to reduce false positives.</td>
</tr>
<tr>
<td>24: Continue to receive edit checks on items intentionally submitted as null - specifically being cited for null errors on advanced MSA/MSA approach calculation data elements. If guidance was for non-missed to complete (revising this will change, requesting additional conditional logic be added to limit edit findings for only those required to report).</td>
<td>Add conditional logic to run edit rules on only institutional IDs that are required to provide the data elements.</td>
<td>Board Statistics have evaluated edits and where applicable have archived or amended edit logic to reduce false positives. In instances where edit logic cannot be updated, edits will be omitted from Respondent Edit reports.</td>
</tr>
<tr>
<td>24: Continue to receive edit checks on items intentionally submitted as null - specifically being cited for null errors on projection periods when not reporting nine-quarter total within the OTTI projection sub-schedule (CPS/FQ68).</td>
<td>Provide an appropriate period to report in (i.e., total) or specify which existing PC the total should be reported in and add condition to only run edit rule on that specific PC.</td>
<td>Board Statistics have evaluated edits and where applicable have archived or amended edit logic to reduce false positives. In instances where edit logic cannot be updated, edits will be omitted from Respondent Edit reports.</td>
</tr>
</tbody>
</table>
### FSR FR Y-14 Edit Check Review: Major Themes

<table>
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<tr>
<th>High Level Justification / Explanation</th>
<th>High Level Recommendations</th>
<th>High Level Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Add conditional logic to run edit rule only when a given vintage would be reportable. Board Statistics have evaluated edits and where applicable have archived or amended edit logic to reduce False Positives. If instances where edit logic cannot be updated edits will be omitted from Respective Edit Reports.</td>
<td>Add conditional logic to run edit rule only when a given vintage would be reportable. Board Statistics have evaluated edits and where applicable have archived or amended edit logic to reduce False Positives. If instances where edit logic cannot be updated edits will be omitted from Respective Edit Reports.</td>
<td>Add conditional logic to run edit rule only when a given vintage would be reportable. Board Statistics have evaluated edits and where applicable have archived or amended edit logic to reduce False Positives. If instances where edit logic cannot be updated edits will be omitted from Respective Edit Reports.</td>
</tr>
<tr>
<td>Promoting note is causing edit check exceptions to occur. The industry group considers these false positive exceptions. For these, there is no appealable value to FRR in collecting responses. Likewise, responding to these is impractical for industry.</td>
<td>For edits where a technical field &quot;must equal&quot; or &quot;must not equal&quot; any of other technical fields, and inclusion of employees, FRR should make allowances in the edit logic so that exceptions do not occur because of insignificant rounding differences. Board Statistics have evaluated edits and where applicable have archived or amended edit logic to reduce False Positives.</td>
<td>For edits where a technical field &quot;must equal&quot; or &quot;must not equal&quot; any of other technical fields, and inclusion of employees, FRR should make allowances in the edit logic so that exceptions do not occur because of insignificant rounding differences. Board Statistics have evaluated edits and where applicable have archived or amended edit logic to reduce False Positives.</td>
</tr>
</tbody>
</table>

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### FSR FR Y-14 Edit Check Review: Major Themes

<table>
<thead>
<tr>
<th>High Level Justification / Explanation</th>
<th>High Level Recommendations</th>
<th>High Level Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Null values are causing redundant edit check exceptions to occur for fields which have multiple validity or quality checks.</td>
<td>Where a validity edit already exists specifically to test for a null value for [FieldName], i.e., &quot;[FieldName] code not provided,&quot; [X] X9994, any additional validity or quality checks against [FieldName], i.e., &quot;[FieldName] code must equal a valid [FAC] code or valid [INC] code or valid [CIG] code,&quot; should only be carried out when [FieldName] is not null. This way, a null value for [FieldName] won’t cause redundant exceptions. FRR should add checks to its logic i.e., &quot;If [FieldName] is NOT NULL, then...&quot;) for validity and quality checks that do not specify any role for a null value of [FieldName] so that redundant exceptions don’t occur.</td>
<td>Board Statistics have evaluated edits and where applicable have archived or amended edit logic to reduce redundant edit failures.</td>
</tr>
<tr>
<td>We received 1550 edit fails on our July 2015 FR Y-14 Multi-Cycle submissio for various Projection Table rules where [FieldName] was null. We did not include [FieldName] in our submission other than the five applicable lines from the Debt Repurchase Worksheet. There are validity edit checks that specifically check for an element to &lt;&gt; null. However, additional Quality or Validity checks can also be triggered when that element is null, which result in the same bank comments.</td>
<td>Board Statistics have evaluated edits and where applicable have archived or amended edit logic to reduce False Positives.</td>
<td>Board Statistics have evaluated edits and where applicable have archived or amended edit logic to reduce False Positives.</td>
</tr>
<tr>
<td>Commented on many syntax edits to not run when the schedule is not applicable</td>
<td>Board Statistics require the execution of syntax edits on all fields.</td>
<td>Board Statistics require the execution of syntax edits on all fields.</td>
</tr>
</tbody>
</table>
# FSR FR Y-14 Edit Check Review: FR Y-14A

<table>
<thead>
<tr>
<th>Recommendations</th>
<th>Action</th>
<th>Description</th>
<th>Cost of Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Add conditional logic to not run this specific edit rule for shortages not complete or reported in prior filing or removed</td>
<td>Bit Logic Updated</td>
<td>Bit logic was amended.</td>
<td>8</td>
</tr>
<tr>
<td>Add logic to determine if subschedule is mandatory for the item.</td>
<td>Bit Logic Updated</td>
<td>Bit was archived after further evaluation.</td>
<td>30</td>
</tr>
<tr>
<td>Amend to exclude testing M120+.</td>
<td>Bit Logic Updated</td>
<td>Bit logic was amended.</td>
<td>50</td>
</tr>
<tr>
<td>Miscellaneous</td>
<td>Bit Logic Updated</td>
<td>Bit logic was amended.</td>
<td>50</td>
</tr>
<tr>
<td>Rounding issues / see other major themes.</td>
<td>Bit Logic Updated</td>
<td>Bit was archived after further evaluation.</td>
<td>30</td>
</tr>
<tr>
<td>Grand Total</td>
<td>Bit Logic Updated</td>
<td>Bit is functioning as expected</td>
<td>200</td>
</tr>
</tbody>
</table>

---

# FSR FR Y-14 Edit Check Review: FR Y-14Q

<table>
<thead>
<tr>
<th>Type</th>
<th>Description</th>
<th>Bit</th>
<th>Cost</th>
<th>Retail AS</th>
<th>Retail Medicare</th>
<th>Retail Medicaid</th>
<th>Retail CHAMP</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bit Logic Updated</td>
<td>Bit logic was amended.</td>
<td>10</td>
<td>5</td>
<td>10</td>
<td>5</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>Bit Logic Updated</td>
<td>Bit was archived after further evaluation.</td>
<td>5</td>
<td>10</td>
<td>5</td>
<td>10</td>
<td>5</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>No Change Required</td>
<td>Bit is functioning as expected</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>No Change Required</td>
<td>Bit logic was amended.</td>
<td>9</td>
<td>3</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>No Change Required</td>
<td>Bit logic was amended.</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>No Change Required</td>
<td>Bit is functioning as expected</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>No Change Required</td>
<td>Bit was archived after further evaluation.</td>
<td>5</td>
<td>10</td>
<td>5</td>
<td>10</td>
<td>5</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>Grand Total</td>
<td></td>
<td>11</td>
<td>33</td>
<td>15</td>
<td>15</td>
<td>15</td>
<td>52</td>
<td></td>
</tr>
</tbody>
</table>
Edit Analysis: Purpose

- Evaluate the effectiveness of edits being performed on all FRY-14 data schedules collected by Statistics.
- Review the explanation of edit failures to determine the usefulness of the information being provided.
- Ensure edits being performed are adding value while taking all stakeholder burden into account.

Edit Analysis: Criteria

- Below are different criteria used by Statistics when creating edit recommendations:
  - Edit failure rate and associated explanation
  - Edit failures due to rounding
  - Edit logic review
  - Edit comparisons within schedules (Consolidation)
  - Edit explanations
Edit Analysis: Milestones and Next Steps

- Create Edit and Explanation Guidelines —> Complete
- Create summary statistics for edit failures by schedule —> Complete
- Perform comprehensive zero base review of edits and create recommendations —> Complete
- Discuss recommendations with end users of each schedule —> July – August 2017
- Implement approved edit updates by schedule —> Q3 2017 – Q1 2018

FR Y-14 Data Quality
FR Y-14 Data Quality

- Overview of collection process and standardization
- Statistics role in achieving data quality
- Best Practices
  - Prior to data due date
  - During submission window
  - Ongoing initiatives
- Commonly asked questions

FR Y-14A and FR Y-14Q Standard Collection Process

- XML submission format
- Centralized storage of data
- Micro Data Reference Manual (MDRM) taxonomy
- Centralized storage of edits and remarks
- Centralized Statistics FAQ procedures and system
Statistics Role in Achieving Data Quality

- Edits support quality and integrity of data on XML schedules.
  - Recommendations for changes and new edits are welcome.

- Statistics develops technical information including edits and data dictionaries which are published on a quarterly basis.
  - No later than 6 weeks prior to each due date.
  - FR Y-14Q and FR Y-14A technical instructions may be published separately.

- Statistics confirms basic data quality and integrity via resolution of edits triggered and reviews relevant remarks commentary for detail and clarity.

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Best Practices: Pre-submission

- Review CCAR Intralinks Technical Instructions
- Review FR Y-14Q Technical Submission Instructions
- Submit test files prior to submission
- Ensure submissions are tagged correctly and file name formats are followed.
- Proactively identify and communicate missing data and data quality issues.

Public / Official Release
Best Practices: During Submission Window

- Review CCAR Intralinks Technical Instructions
- Review FR Y-14Q Technical Submission Instructions
- Alert your Reserve Bank analysts of submissions
- Send well formed remarks with details about specific product or target items.
- Automate edits and send remarks with data
- Don't hesitate to call—we are here to help!

Best Practices: Ongoing Initiatives

- Provide regular updates on remediation efforts
- Regularly review instructions and identify unclear interpretations
- Submit FAQ's as necessary
- Provide edit feedback as necessary
## Commonly Asked Questions

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do file naming conventions apply to data files as well as remarka files?</td>
<td>Yes, both are loaded to the database and should follow naming conventions provided.</td>
</tr>
<tr>
<td>What is the version of the XSD to use for historical submissions and resubmissions?</td>
<td>The current version of the XSD (Master XSD) should always be used in conjunction with the applicable instructions of the time.</td>
</tr>
<tr>
<td>What are the timelines to collect data in XML for schedules currently collected in Excel?</td>
<td>FR Y-14 RS and Ops Risk should transition to XML by the end of 2017.</td>
</tr>
<tr>
<td>Do the XML files still need to be submitted for schedules that are not applicable?</td>
<td>No, if the entire content of an XSD is not applicable, there is no need to submit a blank one.</td>
</tr>
<tr>
<td>Are there plans to use XSD in the future for syntax checks?</td>
<td>Not at this time. Due to the use of a master XSD for historical and current quarter data syntax is not built into the XSD.</td>
</tr>
<tr>
<td>Can we receive technical instructions earlier than 6 weeks?</td>
<td>6 weeks before the data due date is the current commitment. Technical instructions are dependent on final report form and instructions, and require Federal Reserve System development and testing completion before publication of final changes.</td>
</tr>
<tr>
<td>Will historical data submissions be held to the same turnaround time for edits checks?</td>
<td>No, please work with your Federal Reserve contact to ensure reasonable completion of edits for historical data.</td>
</tr>
<tr>
<td>We want to do another test file with real data. Do we need type 1 or can we just submit with type 1?</td>
<td>Either can be done, if you would like to submit a new file with type 1 please inform your Reserve Bank contact and we can delete the test database to start fresh. You can and should also utilize type 0 for test revisions.</td>
</tr>
<tr>
<td>For syntax edit failures, does the submission file need to change from type 1 to type 0 for the resubmission?</td>
<td>If the syntax edit fail on a primary key, two are needed (type 0 and type 1), for all other syntax edits (on non-primary keys fields) a type 1 is needed.</td>
</tr>
</tbody>
</table>
Appendix

Terms

- FAQ: Frequently Asked Questions
- Q&A: Question and Answer
- CCAR: Comprehensive Capital Analysis and Review
Appendix A
List of Participants

July 17, 2017

Attendees

**Ally Financial**
- Brad Joffe
- Jacob Stone

**BancWest**
- Olivia Leong
- Cindy Vasicek

**Bank of America**
- Steve Micka
- Melvelisse Rivera
- Bria Smith

**Barnette Sivon & Natter**
- Jim Sivon

**BMO Harris Bank**
- Kent Luken

**Board of Governors**
- Phillip Daher
- Zachary Dailey
- Nuha Elmaghrabi
- Michael Fisher
- Michael Kraemer
- Tamara Molder
- Evans Muzere
- Laura Olsen
- Richard Palmer
- Nawsheen Rabbani
- Lisa Ryu
- Langston Shaw
- Virginia Wall

**Capital One**
- Sue Graves
- Ruchi Jain
- Kim Sutton

**Citi**
- Irma Aksakal
- Caitlin Connell
- Larissa Conrado
- Kathleen Goldreich
- Mary Grace Ocampo
- Bruno Santos
- Jason Weisman

**Comerica**
- Patricia Cingel

**Credit Suisse**
- Sandeep Kapoor

**Fifth Third Bank**
- Nick Ehlert

**Financial Services Roundtable**
- Rich Foster
- Robert Hatch
- Caleb Raymond

**FRB Philadelphia**
- Larry Cordell
Huntington Bank
Cheryl Clevenger
Shelly Johnson

JPMC
Lee Gaylor
Margo Somma

M&T Bank
Krissy Godios
Tom Ricigliano
Revonda Washington
David Zolnowski

SunTrust
Charles Darden
Paula Maddox

The Clearing House
Emma Hunt
LeighAnn Perina
David Wagner

Royal Bank of Canada
Rohit Sharma

UBS
Subbu Hariharan
Marcus Komm

US Bank
Dora Fickinger
Amy Proshik

Wells Fargo Bank
Gulshan Lakhani
Sean Stone

Wilson Consulting
Greg Wilson