

**Supporting Statement for the
Weekly Report of Selected Assets and Liabilities of Domestically Chartered
Commercial Banks and U.S. Branches and Agencies of Foreign Banks
(FR 2644; OMB No. 7100-0075)**

Summary

The Board of Governors of the Federal Reserve System (Board), under delegated authority from the Office of Management and Budget (OMB), proposes to extend for three years, with revision, the voluntary Weekly Report of Selected Assets and Liabilities of Domestically Chartered Commercial Banks and U.S. Branches and Agencies of Foreign Banks (FR 2644; OMB No. 7100-0075). The FR 2644 is a balance sheet report that is collected as of each Wednesday from an authorized stratified sample of 875 domestically chartered commercial banks and U.S. branches and agencies of foreign banks.

The FR 2644 is the only source of high-frequency data used in the analysis of current banking developments. The FR 2644 collects sample data that are used to estimate universe levels using data from the quarterly commercial bank Consolidated Reports of Condition and Income (FFIEC 031, FFIEC 041, and FFIEC 051; OMB No. 7100-0036) and the Report of Assets and Liabilities of U.S. Branches and Agencies of Foreign Banks (FFIEC 002; OMB No. 7100-0032) (Call Reports). Data from the FR 2644, together with data from other sources, are used to construct weekly estimates of bank credit, balance sheet data for the U.S. banking industry, sources and uses of banks' funds, and to analyze current banking and monetary developments. The Board publishes the data in aggregate form in the weekly H.8 statistical release, *Assets and Liabilities of Commercial Banks in the United States*, which is followed closely by other government agencies, the banking industry, the financial press, and other users.¹ The H.8 release provides a balance sheet for the banking industry as a whole and data disaggregated by its large domestic, small domestic, and foreign-related bank components.

In this proposal, the Board recommends revisions that would simplify and reduce overall reporting requirements associated with this collection. The Board proposes the following modifications to the FR 2644 reporting form:

- (1) Combine the current counterparty split of Federal funds sold and securities purchased under agreements to resell (asset items 3.a and 3.b) with the total of those two items, with a comparable change to the associated borrowings items (liabilities items 9.a and 9.b);
- (2) Drop the separate reporting of Trading assets (item 5) and Trading liabilities (item 10) and include them instead in All other assets (item 6.b) and All other liabilities (item 11.b), respectively;
- (3) Replace Total deposits (item 8) with All other deposits (new item 8.b); and
- (4) Eliminate the items on loans to small businesses (memoranda items 2.a and 2.b).

The annual reporting burden for the proposed FR 2644 report is estimated to be 106,925 hours, a reduction of 20,475 hours from the current burden of 127,400 hours. The first report for the proposed FR 2644 would be implemented as of January 3, 2018.

¹ See www.federalreserve.gov/releases/h8/current/default.htm.

Background and Justification

The FR 2644 reporting form began in 1946, initially collecting data from small banks.² At that time the panel consisted of the universe of small member banks, which reported on a monthly (last-Wednesday) basis. Beginning in 1959, this panel reported on a semi-monthly basis (mid- and last-Wednesdays of the month). Then, beginning in 1969, the panel reported on a weekly basis (as of Wednesday).

In 1979 a two-tier system of reporting was adopted. A stratified sample of 400 member banks reported nine data items (including loans, securities, total assets, and large time deposits) on the FR 2644s. All other small member banks reported three data items (securities, loans, and total assets) on the FR 2644. Each Reserve Bank compiled an aggregate balance sheet for banks within their district, drawing on data from the FR 2644s and FR 2644 as well as from other surveys (including the quarterly Call Report). The district data were used to compile a national total.

The general framework for the FR 2644 was revised in 1984. At that time the Board decided to use a sample approach to estimate bank credit for the universe of all small banks. A stratified sample of 1,100 banks, including nonmember banks for the first time, was selected.

As of July 1, 2009, the Board combined the three weekly bank balance sheet reports, (1) the Weekly Report of Assets and Liabilities for Large Banks (FR 2416; OMB No. 7100-0075), (2) the Weekly Report of Assets and Liabilities for Large U.S. Branches and Agencies of Foreign Banks (FR 2069; OMB No. 7100-0030), and (3) the Weekly Report of Selected Assets (FR 2644; OMB No. 7100-0075), into a single reporting form collected from an authorized stratified sample of 875 domestically chartered commercial banks and U.S. branches and agencies of foreign banks. Over the years, the respondent panel and data items collected on the previous three reports and the current single reporting form have been occasionally modified.

Data from the FR 2644 are used in conjunction with other data to construct estimates of bank credit, sources and uses of bank funds, and a balance sheet for the entire banking system. These statistics are used to analyze current banking and monetary conditions, including the monitoring of broad credit and funding conditions. Currently, there are no other data available that supply the weekly data obtained on the FR 2644.

Description of Information Collection

The FR 2644 currently collects 33 balance-sheet items and 4 memoranda items as of each Wednesday from an authorized stratified sample of 875 domestically chartered commercial banks and U.S. branches and agencies of foreign banks.

² Large banks reported the FR 2416 (Weekly Report of Assets and Liabilities for Large Banks) beginning in 1917 with about 600 reporters; foreign-related institutions (U.S. branches and agencies of foreign banks) began reporting the FR 2069 (Weekly Report of Assets and Liabilities for Large U.S. Branches and Agencies) in July 1981 with about 50 respondents.

Proposed Revisions

The Board proposes several revisions to simplify and reduce the overall reporting burden associated with the FR 2644 report. The proposed FR 2644 reporting form would consist of 29 balance-sheet items and 2 memoranda items, an overall reduction of six data items.

Combine asset items 3.a and 3.b into one data item, and liability items 9.a and 9.b into one data item.

The Board proposes to combine (1) Federal funds sold and securities purchased under agreements to resell with commercial banks in the U.S. (including U.S. branches and agencies of foreign banks) (item 3.a) and (2) Federal funds sold and securities purchased under agreements to resell with others (including nonbank brokers and dealers in securities and FHLB) (item 3.b) into one new item: Federal funds sold and securities purchased under agreements to resell (item 3) and to combine (1) Borrowings (including federal funds purchased and securities sold under agreements to repurchase and other borrowed money) from commercial banks in the U.S. (including U.S. branches and agencies of foreign banks) (item 9.a) and (2) Borrowings (including federal funds purchased and securities sold under agreements to repurchase and other borrowed money) from others (including FRB and FHLB) (item 9.b) into one new item: Borrowings (including federal funds purchased and securities sold under agreements to repurchase and other borrowed money) (item 9).

Counterparty-level detail on federal funds sold and securities purchased under agreements to resell (federal funds) has been collected from large banks since mid-1969 and from small banks since July 2009. Similar information for borrowings has been reported by both large and small banks since October 1996. In the H.8 release, federal funds sold to commercial banks have been included in interbank loans and federal funds sold to others have been included in non-core loans as part of other loans and leases.

These asset/liability breakdowns have provided useful information on counterparties, especially during the financial crisis. However, this information may now be obtained from the Report of Selected Money Market Rates (FR 2420; OMB No. 7100-0357), which collects transaction-level data, including counterparty information, for both federal funds purchased and other borrowings. Therefore, the Board recommends dropping the counterparty detail from the FR 2644 report.

Replace item 8 with new item 8.b.

The Board proposes to replace Total deposits (item 8) with All other deposits (item 8.b). This new item will consist of all deposits other than time deposits of \$100,000 or more. The Board assesses that reporting accuracy will be higher if banks report the two pieces of total deposits separately, rather than reporting total deposits and time deposits of \$100,000 or more, a subset of the former. The Board believes that this small change will reduce the incidence of misreporting, leading to fewer edit failures and less need for explanatory contact with respondents.

Proposed elimination of data items

The Board proposes to stop separately collecting two data items related to banks' derivative and other trading activities: (1) Trading assets, other than securities and loans included above (item 5) and (2) Trading liabilities (item 10). Data item 5 would be included in All other assets (item 6.b), while data item 10 would be rolled into All other liabilities (including subordinated notes and debentures) (item 11.b). Successive data items would be renumbered as appropriate.

During the 2015 renewal of the FR 2644, derivatives with positive and negative fair values, items 5.a and 10.a, the major components of trading assets and trading liabilities respectively, were dropped from the reporting form. Weekly changes in the total items could reasonably be attributed to movements in derivatives, since they accounted for the preponderance of the trading items. However, in the intervening period, the Board has assessed that the benefits of collecting the two trading assets and liabilities items separately, in terms of analytical usefulness, do not exceed the costs of collection.

The Board also proposes to stop collecting two memoranda items: (1) Loans to small businesses amount currently outstanding of "Loans secured by nonfarm nonresidential properties" with original amounts of \$1,000,000 or less (included in item 4.a.(5) above) (item M.2 a) and (2) Loans to small businesses amount currently outstanding of "Commercial and industrial loans to U.S. addressees" with original amounts of \$1,000,000 or less (included in item 4.c above) (item M.2. b).

These memoranda items were added to the FR 2644 reporting form as of January 7, 2015, due to increasing interest in the health of small business lending and the lack of other timely sources of information. The recommendation to discontinue the collection of these data items is based on three factors:

- (1) The new FFIEC 051 Call Report for eligible small banks with assets less than \$1 billion will require only semiannual reporting (June and December) for the related Call Report data items. This new Call Report was implemented as of March 31, 2017. Semiannual, rather than quarterly, reporting by three-fourths of the domestic banks in the universe would severely limit the Board's ability to estimate universe data from the weekly sample FR 2644 data and to sufficiently benchmark those estimates, leading to deterioration in the universe estimates.
- (2) During the development of the FFIEC 051, both in-person conversations with bankers and their comments in response to the associated *Federal Register* notices identified these items as among the most burdensome for banks to provide, in some cases requiring manual intervention to do so.
- (3) Many of the panel respondents, including most of the largest banks, repeat their latest quarterly Call Report figures for these data items. This practice does not provide the Board with the more up-to-date information that it had been seeking.

Reporting panel

As mentioned above, the FR 2644 panel has an authorized size of 875 domestically chartered commercial banks and U.S. branches and agencies of foreign banks. Currently, the panel consists of 814 total reporters—751 domestically chartered banks and 63 foreign-related institutions—and accounts for about 89 percent of all domestic assets at U.S. commercial banks. The number of respondents is less than the authorized size due to mergers among reporters and loss of respondents due to the voluntary nature of the panel. Table 1 presents the number of reporters disaggregated by district and by bank group for the current panel.

Table 1
Number of Reporters on Current FR 2644 Panel³

District	Large	Small ⁴	Foreign-Related	Pending Replacements
1	2	21	0	0
2	7	34	54	11
3	2	43	0	0
4	4	40	0	4
5	4	41	0	3
6	2	70	0	25
7	2	155	3	4
8	0	84	0	4
9	0	33	0	1
10	0	74	0	1
11	0	71	3	5
12	2	60	3	3
TOTAL	25	726	63	61

The current FR 2644 sample's coverage for each data item is included in Attachment 1. The accuracy experienced with the current panel is presented in Table 2.a for small banks and Table 2.b for foreign-related institutions, summarizing the benchmark effects since the last renewal in 2015. While the average revisions are not overly large, they are significant. Therefore, the Board recommends retaining the current authorized sample size of 875 respondents to minimize measurement error.

³ As of March 15, 2017, 814 respondents filed the FR 2644. There have been continuous efforts underway to restore the panel size to 875 reporters.

⁴ Small banks are those not in the 25 largest banks by asset size as of each Call Report.

Table 2.a
Recent Benchmark Revisions to Estimates for Small Banks⁵
(\$ millions, n.s.a.)

Item	Root Mean Square Revision ⁶	Maximum Absolute Revision	Average Level of Asset Item (\$billions) ⁷	Root Mean Square Percentage Revision ⁸
Bank Credit	3,840	11,120	3,586	0.11
U.S. Treasury and Agency Securities	1,522	3,044	598	0.25
Other Securities	1,146	2,979	256	0.45
Commercial Real Estate Loans	153	329	1,018	0.17
Closed-end 1-4 Family Loans	1,374	3,212	547	0.25
Commercial and Industrial Loans	1,925	5,665	515	0.37
Credit Card Loans	142	388	167	0.09
Other Consumer Loans	383	980	166	0.23
All Other Loans	1,257	2,823	199	0.63
Cash	4,894	10,121	343	1.43
Total Assets	4,338	16,172	4,205	0.10
Total Deposits	3,440	14,849	3,308	0.10
Total Borrowings	1,392	3,522	292	0.48
Total Liabilities	4,436	15,843	3,705	0.12

The root mean square revision as a result of 16 quarterly benchmarks between March 2013 and December 2016 was \$3.8 billion or 0.11 percent of the average level of bank credit. This implies that benchmarking revises quarterly bank credit growth estimates for small banks by an average of 0.4 percent at an annual rate. The maximum revision was 2.9 times greater than that amount.

⁵ Summary statistics are calculated for 16 quarterly benchmarks from March 2013 to December 2016.

⁶ The root mean square revision is the square root of the averaged sum of squared revisions. This term may also be referred to as the standard deviation of the revisions around zero.

⁷ Average levels are averages of weekly not seasonally adjusted (n.s.a) data over the period of January 2013 to December 2016.

⁸ Root mean square revision divided by average level of asset item, multiplied by 100.

Table 2.b
Recent Benchmark Revisions to Estimates for Foreign-Related Institutions⁹
(\$ millions, n.s.a.)

Item	Root Mean Square Revision ¹⁰	Maximum Absolute Revision	Average Level of Asset Item (\$billions) ¹¹	Root Mean Square Percentage Revision ¹²
Bank Credit	6,127	15,207	994	0.62
U.S. Treasury and Agency Securities	1,304	3,199	96	1.36
Other Securities	1,323	2,381	105	1.26
Commercial Real Estate Loans	874	2,437	40	2.17
Commercial and Industrial Loans	2,491	5,709	317	0.79
All Other Loans	1,249	3,259	228	0.55
Cash	21,728	44,710	1,165	1.87
Total Assets	40,212	103,194	2,679	1.50
Total Deposits	4,609	9,703	1,059	0.44
Total Borrowings	7,072	15,456	732	0.97
Total Liabilities	45,560	116,207	2,328	1.96

As shown in the last column of Table 2.b, the percentage root mean square revisions over the past 16 benchmarks for foreign-related institutions greatly exceeded those for the small banks shown in Table 2.a. The root mean square revision of \$6.1 billion, or .62 percent of the average level of bank credit, implies an average 2.5 percent benchmark revision at an annual rate. Some components of bank credit and total assets are significantly worse in accuracy; commercial real estate loans, for example, have an average benchmark revision over 8 percent at an annual rate and cash over 7 percent.

Frequency

The Board recommends that the FR 2644 report continue to be submitted weekly, as of the close of business each Wednesday. Weekly data are needed for accurate and timely construction to analyze current banking developments. The balance sheet series are constructed and published weekly. The various data series that are constructed from the report are routinely included in materials prepared for the Board of Governors; the constructed data are also included in analyses provided to the Federal Open Market Committee. None of these series could be constructed on a sufficiently accurate or timely basis if the frequency of reporting were reduced, particularly in periods of market volatility and rapid change in banking conditions.

⁹ Summary statistics are calculated for 16 quarterly benchmarks from March 2013 to December 2016.

¹⁰ The root mean square revision is the square root of the averaged sum of squared revisions. This term may also be referred to as the standard deviation of the revisions around zero.

¹¹ Average levels are averages of weekly not seasonally adjusted (n.s.a) data over the period of January 2013 to December 2016.

¹² Root mean square revision divided by average level of asset item, multiplied by 100.

Time Schedule for Information Collection and Publication

Respondents file the FR 2644 weekly, within a week of the as-of-Wednesday. Aggregate data are constructed at the Board by Thursday and the H.8 Statistical Release, *Assets and Liabilities of Commercial Banks in the United States*, is published on Friday afternoon with an as-of date of two Wednesdays prior. The H.8 Statistical Release provides a balance sheet for the banking industry as a whole as well as for several bank groups (large domestically chartered banks, small domestically chartered banks, and foreign-related institutions), and it is followed by other government agencies, the banking industry, the financial press, and other users.

Legal Status

The Board's Legal Division has determined that the FR 2644 is authorized by section 2A and 11(a)(2) of the Federal Reserve Act (12 U.S.C. §§ 225(a) and 248(a)(2)) and by section 7(c)(2) of the International Banking Act (12 U.S.C. § 3105(c)(2)) and is voluntary. Individual respondent data are regarded as confidential under the Freedom of Information Act (5 U.S.C. § 552(b)(4)).

Consultation outside the Agency

On July 6, 2017, the Board published a notice in the *Federal Register* (82 FR 31327) requesting public comment for 60 days on the extension, with revision, of the FR 2644. The comment period for this notice expires on September 5, 2017.

Estimate of Respondent Burden

As presented in the table below, the current annual reporting burden for the FR 2644 is estimated to be 127,400 hours. The annual reporting burden for the proposed FR 2644 would be 106,925 hours, a decrease of 20,475 hours. The estimated average hours per response for the FR 2644 would decrease from 2.80 hours to 2.35 hours, on a net basis, associated with the proposed revisions. These reporting requirements for the FR 2644 represent less than 1 percent of the total Federal Reserve System paperwork burden.

FR 2644	<i>Number of respondents¹³</i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
Current	875	52	2.80	127,400
Proposed	875	52	2.35	106,925
<i>Change</i>				(20,475)

The total cost to the public is estimated to decrease from the current level of \$6,994,260 to \$5,870,183 for the revised FR 2644.¹⁴

Sensitive Questions

These collections of information contain no questions of a sensitive nature, as defined by OMB guidelines.

Estimate of Cost to the Federal Reserve System

The proposed cost to the Federal Reserve System for collecting and processing the FR 2644 is estimated to be \$2,417,200 per year, a decrease of \$56,500 from the current cost of \$2,473,700. The one-time cost to implement the revised report is estimated to be \$42,900.

¹³ Of the actual respondents, 310 are small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets) www.sba.gov/contracting/getting-started-contractor/make-sure-you-meet-sba-size-standards/table-small-business-size-standards.

¹⁴ Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$18, 45% Financial Managers at \$67, 15% Lawyers at \$67, and 10% Chief Executives at \$93). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2016*, published March 31, 2017, www.bls.gov/news.release/ocwage.t01.htm. Occupations are defined using the BLS Occupational Classification System, www.bls.gov/soc/.

Attachments

- 1. Coverage of FR 2644 Sample**
- 2. Proposed FR 2644 Usage Table**

Attachment 1
Coverage of FR 2644 Sample (in Percent)¹⁵

Asset Item	Domestically Chartered	Small Domestic	Foreign-Related
1. Cash	91.7	67.7	82.0
2. Securities:			
a. U.S. Treasury securities and U.S. government agency obligations:			
(1) Mortgage-backed securities	92.4	71.9	88.4
(2) Other U.S. government and U.S. agency obligations	89.7	62.4	86.8
b. Other securities			
(1) Mortgage-backed securities	94.4	64.5	99.7
(2) All other securities	82.6	51.8	78.2
3. Federal funds sold and securities purchased under agreements to resell:	95.8 ¹⁶	74.2 ¹⁶	
a. With commercial banks in the U.S.			96.1
b. With others			82.3
4. Loans and leases:			
a. Loans secured by real estate:			
(1) Construction, land development, and other land loans	72.5	56.8	72.2
(2) Secured by farmland	37.0	30.3	98.7
(3) Secured by 1-4 family residential properties:			
(a) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	91.1	70.0	81.8
(b) Closed-end loans secured by 1-4 family residential properties	86.2	60.9	27.2
(4) Secured by multifamily (5 or more) residential properties	80.6	64.5	75.3
(5) Secured by nonfarm nonresidential properties	73.2	58.6	68.8
b. Loans to, and acceptances of, commercial banks in the U.S.	95.3	53.3	59.9
c. Commercial and industrial loans	90.0	70.4	80.6
d. Loans to individuals for household, family, and other personal expenditures:			
(1) Credit cards and other revolving credit plans	99.0	96.0	n.a.
(2) Auto loans	95.9	77.2	n.a.
(3) Other consumer loans	89.3	79.6	n.a.
e. Loans to nondepository financial institutions	97.1	82.5	92.2
f. All other loans and leases	89.4	64.0	84.8

¹⁵ Based on December 31, 2016, Call Report.

¹⁶ Components are not available on domestic Call Report.

Asset Item	Domestically Chartered	Small Domestic	Foreign-Related
g. Allowance for loan and lease losses	86.4	63.8	n.a.
5. Trading assets, other than loans and securities included above	99.8	91.2	97.0
6. Other assets:			
a. Net due from related foreign offices	99.8	78.2	93.0
b. All other assets	91.2	67.0	94.8
7. Total assets	88.5	65.4	84.8
Liability Item			
8. Total deposits	87.4	64.1	85.9
a. Time deposits of \$100,000 or more	75.9	49.6	86.3
9. Borrowings:	91.9 ¹⁶	71.9 ¹⁶	
a. From commercial banks in the U.S.			81.0
b. From others			86.4
10. Trading liabilities	99.8	94.3	97.9
11. Other liabilities:			
a. Net due to related foreign offices	99.9	99.5	77.5
b. All other liabilities	95.7	76.8	95.3
12. Total liabilities	88.4	65.3	84.8
Memoranda			
1. Net unrealized gains (losses) on available-for-sale securities	n.a.	n.a.	n.a.
a. Net unrealized gains (losses) on available-for-sale securities, U.S. Treasury and U.S. Government agency obligations, mortgage-backed securities	n.a.	n.a.	n.a.
2. Loans to small businesses:			
a. Amount currently outstanding of "Loans secured by Nonfarm nonresidential properties" with original amounts of \$1,000,000 or less	57.5	46.2	n.a.
b. Amount currently outstanding of "Commercial and industrial loans to U.S. addressees" with original amounts of \$1,000,000 or less	74.6	51.7	n.a.

n.a. Not available

¹⁶ Components not available on domestic Call Report.

Attachment 2
Proposed FR 2644 Usage Table

Proposed FR 2644 Asset Item	Usage
1. Cash	H.8; sources and uses of funds.
2. Securities:	
a. U.S. Treasury securities and U.S. government agency obligations:	
(1) Mortgage-backed securities	Bank credit; H.8; investment strategy; analysis of MBS market.
(2) Other U.S. government and U.S. agency obligations	Bank credit; H.8; investment strategy.
b. Other securities	
(1) Mortgage-backed securities	Bank credit; H.8; investment strategy; analysis of MBS market.
(2) All other securities	Bank credit; H.8; investment strategy.
3. Federal funds sold and securities purchased under agreements to resell	H.8; sources and uses of funds
4. Loans and leases:	
a. Loans secured by real estate:	
(1) Construction, land development, and other land loans	Bank credit; H.8; commercial sector.
(2) Secured by farmland	Bank credit; H.8; commercial sector.
(3) Secured by 1-4 family residential properties:	
(a) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit	Bank credit; H.8; consumer borrowing.
(b) Closed-end loans secured by 1-4 family residential properties	Bank credit; H.8; consumer borrowing.
(4) Secured by multifamily (5 or more) residential properties	Bank credit; H.8; commercial/residential sectors.
(5) Secured by nonfarm nonresidential properties	Bank credit; H.8; commercial/residential sectors.
b. Loans to, and acceptances of, commercial banks in the U.S.	H.8; interbank borrowing.
c. Commercial and industrial loans	Bank credit; H.8; analysis of commercial lending.
d. Loans to individuals for household, family, and other personal expenditures:	
(1) Credit cards and other revolving credit plans	Bank credit; H.8; consumer borrowing
(2) Automobile loans	Bank credit; H.8; consumer borrowing
(3) Other consumer loans	Bank credit; H.8; consumer borrowing.
e. Loans to nondepository financial institutions	Bank credit; H.8; analysis of alternative business lending.
f. All other loans and leases	Bank credit; H.8.

g. Allowance for loan and lease losses	H.8; derivation of net total assets.
6. Other assets:	
a. Net due from related foreign offices	H.8; managed liabilities.
b. All other assets	H.8; sources and uses of funds.
7. Total assets	H.8.
Proposed FR 2644 Liability Item	Usage
8. Total deposits:	
a. Time deposits of \$100,000 or more	H.8; sources of funds analysis.
b. All other deposits	H.8; sources of funds analysis
9. Borrowings	H.8; managed liabilities
11. Other liabilities:	
a. Net due to related foreign offices	H.8; managed liabilities.
b. All other liabilities	H.8; sources of funds.
12. Total Liabilities	H.8.
Proposed Memorandum Item	Usage
1. Net unrealized gains (losses) on available-for-sale securities	H.8; book value of securities.
a. Net unrealized gains (losses) on available-for-sale securities, U.S. Treasury and U.S. government agency securities, mortgage-backed securities (included in item M.1 above)	H.8; book value of agency MBS.