

**OMB Supporting Statement  
for the Capital Assessments and Stress Testing information collection  
(FR Y-14A/Q; OMB No. 7100-0341)**

**Summary**

The Board of Governors of the Federal Reserve System (Board), under delegated authority from the Office of Management and Budget (OMB), proposes to revise, without extension, the current Capital Assessments and Stress Testing information collection (FR Y-14A/Q; OMB No. 7100-0341). The FR Y-14A annually collects large bank holding companies' (BHCs') quantitative projections of balance sheet, income, losses, and capital across a range of macroeconomic scenarios and qualitative information on methodologies used to develop internal projections of capital across scenarios. The FR Y-14Q collects granular data on BHCs' various asset classes and pre-provision net revenue (PPNR) for the reporting period, which are used to support supervisory stress test models and for continuous monitoring efforts, on a quarterly basis.<sup>1</sup>

The Federal Reserve proposes revising the information collection, effective June 30, 2012, based on the need to expand the respondent panel, enhance data items previously collected, and implement new reporting schedules. The proposed revisions include the following:

- implementing a new monthly schedule, the FR Y-14M, which would collect data previously collected on several quarterly Retail Risk portfolio-level worksheets (into two loan-level only collections and one loan- and portfolio-level collection), and collecting detailed address matching data for the two loan-level collections;
- revising the quarterly Wholesale Risk schedule (corporate loan data collection) by adding data items that would allow the Federal Reserve to derive an independent probability of default, expanding the scope of loans included in the collection by moving loans from the Commercial Real Estate (CRE) data collection to the corporate loan data collection, clarifying definitions of existing data items, and requesting additional detail about collateral securing a facility;
- revising the quarterly Wholesale Risk schedule (CRE collection) by moving loans to the corporate loan data collection, adding a non-accrual data item, and modifying the loan status data item to include the number of days past due;
- implementing a new quarterly Operational Risk schedule to gather data that would support supervisory stress test models to forecast the BHCs' operational loss levels under various macroeconomic conditions; and
- expanding the respondent panel (for the FR Y-14 A/Q/M) to include large banking organizations that meet an asset threshold of \$50 billion or more in total consolidated assets (large BHCs), as defined by the Capital Plan rule (12 CFR 225.8).<sup>2</sup>

---

<sup>1</sup> BHCs are required to submit both quarterly and annual schedules for third quarter data, with the exception of the Basel III/Dodd-Frank and Regulatory Capital Instruments schedules. For these schedules, only data for the annual schedules are submitted for 3<sup>rd</sup> quarter data.

<sup>2</sup> The Capital Plan rule applies to every top-tier large BHC. This asset threshold is consistent with the threshold established by section 165 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) relating to enhanced supervision and prudential standards for certain BHCs.

Under section 165 of the Dodd-Frank Act, the Federal Reserve is required to issue regulations relating to stress testing (DFAST) for certain BHCs and nonbank financial companies supervised by the Board. In January 2012, the Board published rulemakings (77 FR 594) which would include new reporting requirements found in 12 CFR 252.134(a), 252.146(a), and 252.146(b) related to stress testing. The Federal Reserve anticipates that these new reporting requirements and the burden associated with these requirements would be addressed in detail in a future FR Y-14 proposal.<sup>3</sup>

The current reporting panel consists of the 19 large domestic BHCs that participated in the 2009 Supervisory Capital Assessment Program (SCAP) and the Comprehensive Capital Analysis and Review 2011 (CCAR 2011) exercises<sup>4</sup> (collectively, the BHCs). These BHCs are required to complete the FR Y-14A (including the Summary, Macro Scenario, Counterparty Credit Risk (CCR), Basel III/Dodd-Frank, and Regulatory Capital Instruments data schedules) and the FR Y-14Q (including the Securities Risk; Retail Risk; PPNR Risk; Wholesale Risk; Trading, Private Equity, and Other Fair Value Assets (Trading Risk); Basel III/Dodd-Frank; and Regulatory Capital Instruments data schedules). While there are currently 12 annual and quarterly schedules<sup>5</sup> spanning eight risk types, the number of schedules each BHC completes is subject to materiality thresholds.<sup>6</sup>

The data would be used to assess the capital adequacy of large BHCs using forward-looking projections of revenue and losses, to support supervisory stress test models and continuous monitoring efforts, as well as, to inform the Federal Reserve's operational decision-making as it continues to implement the Dodd-Frank Act.

---

<sup>3</sup> The proposed rules would implement the enhanced prudential standards required to be established under section 165 of the Dodd-Frank Act and the early remediation framework established under section 166 of the Act. The enhanced standards include risk-based capital and leverage requirements, liquidity standards, requirements for overall risk management, single-counterparty credit limits, DFAST requirements, and debt-to-equity limits for companies that the Financial Stability Oversight Council has determined pose a grave threat to financial stability. The 2011 proposal implementing the FR Y-14A and Q acknowledged the impending publication of the DFAST reporting requirements under section 165 of the Dodd-Frank Act. That proposal included a statement noting that revisions to the quarterly and annual data collections, based on the enhanced standards rulemaking, would be incorporated into the FR Y-14A and Q information collection.

<sup>4</sup> All but one BHC that participated in the SCAP exercise had total assets greater than \$100 billion as of year-end 2008. In the case of one BHC that participated in the SCAP exercise, the successor BHC participated in the CCAR 2011 exercise.

<sup>5</sup> The FR Y-14 gathers detailed data on 12 annual and quarterly reporting "schedules" that represent various different risk types. Under each risk schedule, data are either collected in the form of "worksheets" or "collections". Worksheet requirements are typically provided to the respondents in a spreadsheet format with multiple worksheets (or tabs in the spreadsheet file) per schedule. Collections are typically provided to respondents in the form of file specifications and gather large volumes of detailed loan-level or account-level data for various portfolios.

<sup>6</sup> All BHCs are required to submit the quarterly PPNR schedule. Only BHCs subject to the Board's advanced approaches risk-based capital rules (12 CFR part 225, Appendix, G) are required to submit the annual Operational Risk worksheet (contained in the Summary schedule) and would be required to submit the proposed quarterly Operational Risk schedule. Only the six BHCs that were subject to the market shock in CCAR 2011 submit the Trading and CCR schedules. All other annual and quarterly schedules are subject to materiality thresholds. Material portfolios are defined as those with asset balances greater than \$5 billion or asset balances relative to Tier 1 capital greater than 5 percent on average for the four quarters that precede the reporting quarter. For immaterial portfolios, the Federal Reserve assigns scenario losses to these portfolios in a manner consistent with the given scenario.

Draft files illustrating the proposed new schedules and instructions, and the proposed revisions to the current reporting schedules and instructions are available on the Federal Reserve Board's public Website at: <http://www.federalreserve.gov/boarddocs/reportforms/review.cfm> The total current annual burden for FR Y-14A/Q is estimated to be 553,629 hours and is estimated to increase to 954,702 annual hours, an increase of 401,073 hours.

## **Background and Justification**

During the years leading up to the recent financial crisis, many BHCs made significant distributions of capital, in the form of stock repurchases and dividends, without due consideration of the effects that a prolonged economic downturn could have on their capital adequacy and ability to continue to operate and remain credit intermediaries during times of economic and financial stress.

In 2009, the Board conducted the SCAP, a "stress test" of 19 large, domestic BHCs. The SCAP was focused on identifying whether large BHCs had capital sufficient to weather a more-adverse-than-anticipated economic environment while maintaining their capacity to lend. The Federal Reserve required BHCs identified as having capital shortfalls to raise specific dollar amounts of capital within six months of the release of the SCAP results. The Department of the Treasury established a government backstop available to BHCs unable to raise the required capital from private markets.

In early 2011, the Federal Reserve continued its supervisory evaluation of the resiliency and capital adequacy processes of 19 BHCs through the CCAR 2011. The CCAR 2011 involved the Federal Reserve's forward-looking evaluation of the internal capital planning processes of the BHCs and their anticipated capital actions in 2011, such as increasing dividend payments or repurchasing or redeeming stock. In the CCAR 2011, the Federal Reserve evaluated whether these BHCs had satisfactory processes for identifying capital needs. The CCAR 2011 also evaluated whether these BHCs held adequate capital to maintain ready access to funding, continue operations and meet their obligations to creditors and counterparties, and continue to serve as credit intermediaries, even under stressful conditions. As a result of the CCAR 2011, the Federal Reserve developed a deeper understanding of the processes by which large BHCs form and monitor their assessments and expectations for maintaining appropriate capital, and the appropriateness of their planned actions and policies for returning capital to shareholders.

On December 1, 2011, the Federal Reserve published a final rulemaking (capital plan rule) in the *Federal Register* (76 FR 74631) that revised the Board's Regulation Y requiring large BHCs to submit capital plans to the Federal Reserve annually and to require such BHCs to request prior approval from the Federal Reserve under certain circumstances before making a capital distribution. In connection with submissions of capital plans to the Federal Reserve, BHCs are required, pursuant to 12 CFR 225.8(d)(3), to provide certain data to the Federal Reserve. The information collection notice implementing the reporting requirements to support the ongoing CCAR exercise (or CCAR 2012) and fulfilling the data collection requirements under 12 CFR 225.8(d)(3) was published in the *Federal Register* on November 29, 2011 (76 FR 73634). The data collection for CCAR 2012 (as described in the following Description of

Information Collection section) is designed to minimize burden on the BHCs and avoid duplication. Data required by the Federal Reserve includes, but is not be limited to, information regarding the BHCs' financial condition, structure, assets, risk exposure, policies and procedures, liquidity, and management.

The Federal Reserve continues to hold large BHCs to an elevated capital planning standard because of the elevated risk posed to the financial system by large BHCs and the importance of capital in mitigating these risks. The final capital plan rule addressed the practices that led up to the financial crisis, building upon the Federal Reserve's existing supervisory expectation that large BHCs have robust systems and processes that incorporate forward-looking projections of revenue and losses to monitor and maintain their internal capital adequacy. The final capital plan rule built also upon the Federal Reserve's recent supervisory practice of requiring capital plans from large, complex BHCs.

### **Description of Information Collection**

The data collected through the FR Y-14A/Q provides the Federal Reserve with the additional information and perspective needed to help ensure that large BHCs have strong, firm-wide risk measurement and management processes supporting their internal assessments of capital adequacy and that their capital resources are sufficient given their business focus, activities, and resulting risk exposures. The CCAR is also complemented by other Federal Reserve supervisory efforts aimed at enhancing the continued viability of large BHCs, including continuous monitoring of BHCs' planning and management of liquidity and funding resources, and regular assessments of credit, market and operational risks, and associated risk management practices. Information gathered in this data collection is also used in the supervision and regulation of these financial institutions. In order to fully evaluate the data submissions, the Federal Reserve may conduct follow up discussions with or request responses to follow up questions from respondents, as needed.

Currently, respondents are required to complete and submit five filings each year: one annual FR Y-14A filing and four quarterly FR Y-14Q filings. Compliance with these information collections is mandatory.

#### ***Current FR Y-14A (annual collection)***

The annual collection of BHCs quantitative projected regulatory capital ratios across four scenarios (BHC baseline, BHC stress, Supervisory baseline, and Supervisory stress) comprises five primary schedules (the Summary, Macro Scenario, CCR, Basel III/Dodd-Frank, and Regulatory Capital Instruments schedules), each with multiple supporting worksheets. The two hypothetical supervisory scenarios provided by the Federal Reserve are used to assess the strengths and resiliencies of the BHCs' capital in a baseline economic environment and in a particularly adverse one (or stressed environment).

Except for the Basel III/Dodd-Frank schedule (described below), which collects annual forecast data, all other FR Y-14A schedules collect quarter-by-quarter results and projections.

BHCs must complete each FR Y-14A schedule for each of the four scenarios and they must include:

- current and projected balances for balance sheet and off-balance-sheet positions and exposures for a number of identified categories under each scenario;
- reconciliation that clearly demonstrates that all balances have been accounted for in the analysis, or demonstrate that the current balances for each category tie to the corresponding category of the mandatory Consolidated Financial Statements for Bank Holding Companies (FR Y-9C; OMB No. 7100-0128);
- estimates of loss as specified in each schedule;
- potential losses or exposures not captured in other data items should be included in the completed schedules, and a description of the source of the losses should be attached; and
- estimates of resources available to absorb losses, including pre-provision net revenue, the allowance for loan and lease losses, and capital.

BHCs are also required to submit qualitative information supporting their projections, including descriptions of the methodologies used to develop the internal projections of capital across scenarios and other analyses that support their comprehensive capital plans.

### **Summary Schedule**

The Summary schedule collects information necessary for the Federal Reserve to evaluate projections of regulatory capital ratios across a range of scenarios as part of the broader CCAR initiative. This information includes projections of losses, revenues, and capital actions that are the primary determinants of projected capital ratios. By collecting these data, along with other qualitative information, the Federal Reserve is able to assess the appropriateness and robustness of the methodologies used by the BHCs and to identify areas where improvements are necessary. This is a critical part of the forward-looking evaluation of the BHCs' capital adequacy.

The Summary schedule comprises three primary components – income statement projections, balance sheet projections, and capital-related projections. There are also a number of worksheets for the BHCs to provide separate projection data related to various components of the income statement, including charge-offs on various loan portfolios, gains or losses related to trading activities and counterparty positions, operational risk losses, gains or losses on securities, and PPNR. Every worksheet contained within the Summary schedule is required to be submitted for each scenario evaluated by the BHC and several worksheets require the submission of nine quarters of projected data (this is also referred to as the forecast time horizon).

The *Income Statement worksheet* collects data on quarterly projections of losses and revenues. This worksheet is organized similar to, but not identical to, the FR Y-9C. For example, BHCs report estimates of losses for all categories of loans, securities, and trading assets and include estimates of the components of BHCs' revenue. In addition, this worksheet collects certain tax-related data items. The *Balance Sheet worksheet* collects data on quarterly projections of the balance sheet, which includes components of assets, liabilities, and equity capital. The *Capital worksheet* collects data on quarterly projections of equity capital and regulatory capital. In addition, this worksheet also collect projections of capital actions such as:

common dividends and share repurchases that affect BHCs' equity capital, projections of the thresholds and deductions necessary to estimate regulatory capital, ancillary data on other balance sheet items and risk-weighted assets, supporting data necessary to estimate the effect of the deferred tax asset on regulatory capital, and supporting data related to discretionary capital actions.

The *Retail Risk worksheets* collect expected losses on the respective retail portfolios. The *Retail Risk worksheets* also collected historical repurchase data (for the BHC baseline scenario only) during the initial submission made by BHCs and will collect any revisions to the historical data thereafter.

The *Operational Risk worksheets* collect BHCs' projections for operational losses which are defined as losses arising from inadequate or failed internal processes, people, and systems or from external events including legal losses. Some examples of operational loss events are losses related to improper business practices (including class action lawsuits), execution errors, and fraud. The *Operational Risk worksheets* also collected historical operational loss data during the initial submission made by the BHCs and will collect any revisions to the historical data thereafter. Additional detail may be requested in order to translate the BHCs' historical loss experience into operational loss projections and on any budgeting processes used to project operational losses.

The *Trading Risk and CCR worksheets* collect projected losses associated with a global market risk shock exercise from BHCs with large trading operations. The Federal Reserve provides a set of hypothetical shocks to the risk factors most relevant to the trading and counterparty positions of respondent BHCs. For example, the shock exercise could be generally based on the price and spread movements that occurred in the second half of 2008, a period featuring severe market dislocations and the failure of a major, globally active financial institution. In addition, the exercise could reflect additional stresses related to a situation in Europe. The trading and CCR positions should be based on balances as-of the close of business, of a specified 4<sup>th</sup> quarter date that is expected to fluctuate moderately from year to year (the announcement of the date will come after the as-of-date).

Several *Securities Risk worksheets* collect data related to Available-for-Sale (AFS) and Held-to-Maturity (HTM) securities. The worksheets collect data and information such as: projected other-than-temporary impairment (OTTI) by asset class for each quarter of the forecast time horizon; methodologies and assumptions used to generate the OTTI projections for each asset class; projected stressed fair market value (FMV) for each asset class as well as qualitative information on the methodologies and assumptions used to generate the stressed market value; and actual FMV including the source (vendor or proprietary) and key assumptions used in determining market values (if using a proprietary model).

The *PPNR Risk worksheets* collect data related to projected net interest income (NII) and noninterest revenues and expenses under the relevant scenario.<sup>7</sup> The collection includes

---

<sup>7</sup> For the annual filing, BHCs with deposits comprising less than one third of total liabilities for any reported period need only complete the *PPNR Projections worksheet* and the related portion of the *PPNR Metrics worksheet*.

projections of balances of interest-bearing assets and liabilities and the associated interest income and expense for each data item; non-interest income related to loan origination, servicing, advisory services, trading commissions and fees; non-interest expense related to compensation, occupancy, and services; and other relevant data items. BHCs also provide additional information in the supporting documentation, including a discussion of the consistency of a given worksheet with the BHCs' internal and external reporting and forecasting; a description of broadly-defined types of business models currently used (e.g. Asset/Liability, Relationship, Business Product/Services/Activity and others); high-level descriptions of motivations for their choices of models for conducting business, reporting (internal and external), and forecasting profit and loss result; benefits and challenges associated with those models; and methodologies employed.

Along with the quantitative Summary schedule, BHCs are required to respond to a qualitative questionnaire or submit a comprehensive document explaining the methods used to develop the projections included in each of the Summary worksheets. The document should include information about how the BHCs translated the macroeconomic scenarios into the various projections, including detailed descriptions of any models used. The BHCs are also required to reconcile any differences between financial data submitted in publicly available regulatory filings and data submitted in the Summary schedule.

### **Macro Scenario Schedule**

The Macro Scenario schedule collects the economic variables used in the BHC-defined macroeconomic scenarios underlying BHCs' projections of loss, revenue, and capital. This schedule includes the *Scenario Variable Definitions worksheet* that collects the variable names and definitions detailed in each of the scenario worksheets. The reported variable definitions (reported on the *Scenario Variable Definitions worksheet*) must include the units of measure (for example, percentage points or billions of dollars) and the frequency of the variable (for example, quarterly average if it is produced monthly or more often). The *BHC Baseline Scenario worksheet* and the *BHC Stress Scenario worksheet* must be completed, including the list and definitions included in these scenarios. The Macro Scenario schedule also includes optional worksheets for the Supervisory baseline scenario, Supervisory stress scenario, and any additional scenarios beyond the baseline and stressed scenarios. Each scenario worksheet collects the variable name (matching to that which is reported on the *Scenario Variable Definitions worksheet*), the actual value of the variable during the 3<sup>rd</sup> quarter of the reporting year, and the projected value of the variable for nine future quarters.

BHCs are required to document the methods used to generate the scenarios. If the BHCs use a scenario generated by a third party, at a minimum the following should be documented: name of the vendor, date that the scenario was generated (if known), and any changes made to the scenario. If BHCs generate the scenario, the documentation must include a detailed description of any models used and how the BHCs adjusted the models to produce the various scenarios.

## **CCR Schedule**

The CCR schedule collects, on various worksheets, data to identify credit valuation adjustment (CVA)<sup>8</sup>, exposures, and CVA sensitivities for the BHC's top counterparties along a number of dimensions, including current CVA, stressed CVA, net current exposure, and gross current exposure. BHCs also must submit aggregate CVA, exposures, and CVA sensitivities by ratings categories. The *Notes to the CCR Schedule worksheet* allows BHCs to voluntarily submit additional information to provide clarity to the portfolio. BHCs are required to run multiple scenarios (stressed, unstressed, or shock) and specifications (BHC or Federal Reserve) to capture Expected Exposure<sup>9</sup> profiles.

## **Basel III/Dodd-Frank Schedule**

Based on the Basel III framework promulgated by the Basel Committee on Bank Supervision, the Basel III/Dodd-Frank schedule collects annual 4<sup>th</sup> quarter forecasts of Tier 1 Common Equity, Tier 1 Capital, Risk-Weighted Assets (RWA), and Leverage Exposures (along with granular components of those elements) through year-end 2016 (or the year by which a BHC plans to meet Basel III target capital ratios) under a baseline scenario. Finally, BHCs are required to submit the effect on Basel III measurements of any significant planned actions to be taken in response to Basel III and the Dodd-Frank Act (for example, asset sales, asset wind-downs, and data collection and modeling enhancements).

## **Regulatory Capital Instruments Schedule**

The Regulatory Capital Instruments schedule collects CUSIP-level<sup>10</sup> contractual terms of BHCs' regulatory capital instruments, as defined under the Board's current regulatory capital rules for BHCs (12 CFR part 225, Appendices A, E, and G). The data collected supports analyses and coordinated responses to future proposed capital actions. BHCs are required to provide a detailed inventory of their regulatory capital instruments as of the data collection date and provide details on regulatory capital instruments they project to redeem or issue over a 9-quarter period.

### ***Current FR Y-14Q (quarterly collection)***

Data submitted on FR Y-14Q schedules (the Securities Risk, Retail Risk, PPNR Risk, Wholesale Risk, Trading Risk, Basel III/Dodd-Frank, and Regulatory Capital Instruments schedules), which collect BHC-specific data on positions and exposures, are used as input to supervisory stress test models and to monitor actual versus forecast information on a quarterly basis.

---

<sup>8</sup> CVA is the difference between the risk-free portfolio value and the true portfolio value that takes into account the possibility of default by a counterparty. In other words, CVA is the market value of counterparty credit risk.

<sup>9</sup> Counterparty credit exposure is a measure of the amount that would be lost in the event that a counterparty to a financial contract defaults. Only contracts that are privately negotiated between counterparties, i.e. over-the-counter (OTC) derivatives, are subject to counterparty credit risk. The Expected Exposure is the average of the distribution of exposures at any particular future date before the longest maturity in the portfolio.

<sup>10</sup> CUSIP refers to the Committee on Uniform Security Identification Procedures. This 9-character alphanumeric code identifies any North American security for the purposes of facilitating clearing and settlement of trades.



## **Securities Risk Schedule**

The Securities Risk schedule gathers CUSIP-level and summary-level information on all positions in BHCs' AFS and HTM portfolios. This CUSIP-level position schedule collects such data as the amortized cost, market value, current face value, and original face value of each position. The data collected allows the Federal Reserve to analyze risk to BHCs' securities portfolios under a variety of scenarios and market shocks with greater precision than is possible with existing data collections.

## **Retail Risk Schedule**

The Retail Risk schedule collects information about the distribution of risk in retail portfolios across segments for four major categories: residential, credit card, automobile, and other consumer. For residential, credit card, and other consumer, separate retail risk worksheets collect data for the different product types within each of these categories. For all four major categories, separate product-type segmentation schemes are used for domestic and international loans. For example, residential is divided into first lien mortgages, home equity lines of credit, and home equity loans; credit card is split between bank and charge cards, and small business and corporate cards; and student loans are reported separately from the other consumer category. Within each broad product-type segment, the portfolio is broken into a number of buckets that embody unique risk characteristics.

This modular product-type design of the Retail Risk schedule allows for a targeted data collection from only the BHCs that have material portfolios in a given product area. This design is intended to limit burden while maximizing the supervisory information yielded from the collection.

## **PPNR Risk Schedule**

For the PPNR Risk schedule, BHCs provide relevant data for PPNR. PPNR comprises three major components: net interest income, non-interest income, and non-interest expense.<sup>11</sup> For both net interest income and non-interest income, BHCs submit historical data based on a business line breakdown. Collection of these data in this format is based on the assumption that the revenues generated by different business lines react differently under various scenarios and such a view facilitates a more robust analysis of the resulting projections. BHCs provided historical data for the first submission and will provide quarterly revisions thereafter. BHCs also provide additional information in the supporting documentation for the PPNR schedule, including the discussion of the consistency of a given schedule with the BHCs' internal and external reporting and forecasting; a description of broadly-defined types of business models they currently use (e.g. Asset/Liability, Relationship, Business Product/Services/Activity and others); high-level descriptions of motivations for their choices of models for conducting

---

<sup>11</sup> Similar to the annual PPNR Risk worksheet submission, for the quarterly submission BHCs for which deposits comprise less than one third of total liabilities for any reported period need only complete the *PPNR Submission worksheet* and the related portion of the *PPNR Metrics worksheet*.

business, reporting (internal and external), and forecasting profit and loss result; benefits and challenges associated with those models; and methodologies employed.

### **Wholesale Risk Schedule**

For the Wholesale Risk schedule, BHCs submit wholesale loan portfolio data that comprise the corporate loan and CRE loan portfolios. These data provide critical information on the performance of the loan portfolios in order to be used to develop stress test loss estimates and other analytical purposes. Given the distinct characteristics of each portfolio, these data are collected under two data schedules.

For the corporate loan portfolio, BHCs provide loan-level data about the characteristics of credit exposures (for example, legally binding loan commitments or credit facilities) for each exposure equal to or greater than \$1 million. The collection includes corporate loans, held at the BHC-level, to both domestic and foreign borrowers. For purposes of this collection, applicable corporate loan portfolios currently include loans to large corporations, small businesses (excluding scored or delinquency managed small business loans for which a commercial internal rating is not used), foreign governments, depository and non-depository financial institutions, agriculture loans, as well as all other commercial loans and leases as defined by the FR Y-9C. Data items include borrower name (individuals' names are not collected), loan amount, loan type, maturity and internal risk rating. In order to minimize burden on the BHCs, the corporate loan portfolio includes a \$1 million commitment threshold for the reporting of certain other loan categories.

For the CRE loan portfolio, BHCs provide loan-level data about the characteristics of credit exposures for each CRE loan equal to or greater than \$1 million. For purposes of this collection, applicable CRE loan portfolios currently include 1-4 family residential construction loans, other construction and land development loans, multifamily loans, non-farm or non-residential loans, loans to finance CRE but not secured by CRE, and international CRE loans (for example, non-domestic office loans), as defined by the FR Y-9C. Given the complexity of CRE portfolios, these data include loan information (for example, borrower name (individuals' names is not collected), loan amount, loan type, maturity and internal risk rating) and property information (for example, property type, net operating income, property value, and occupancy). For loans less than \$1 million that are cross collateralized with loans that have commitments greater than \$1 million, BHCs submit only three data items (loan number, outstanding balance, and committed balance).

### **Trading Risk Schedule**

The Trading Risk schedule captures profit and loss (P/L) sensitivities to assets that BHCs hold in their trading books, private equity investments, and certain other assets held under fair value accounting.<sup>12</sup> The worksheets that make up the Trading schedule capture detailed

---

<sup>12</sup> Trading book assets are those assets that are reported as trading securities on the FR Y-9C; private equity includes all equity related investments such as common, preferred, and convertible investments; other fair value assets are assets held under fair value option (FVO) accounting except for retail and corporate loans which should be included in the Retail and Wholesale schedules.

information on the BHCs' P/L sensitivities to changes in equity prices, foreign exchange rates, interest rates, credit spreads, and commodity prices. Information on the trading book is reported in the form of various spot sensitivities, as well as through multidimensional P/L sensitivity grids for products that tend to exhibit nonlinear P/L response to underlying risk factors. The worksheets in this schedule collect information on both the sector (industry) and geographical compositions of exposures to such assets. Additional data are collected for trading incremental default risk (IDR): Corporate and Sovereign Credit, and Securitized Products.

### **Basel III/Dodd-Frank Schedule**

The quarterly Basel III/Dodd-Frank schedule is a streamlined version of the annual schedule and collects actual balances for Basel III Tier 1 Common Equity, Tier 1 Capital, RWA, Leverage Exposures (including some components of RWAs and Leverage Exposures, if available), capital instruments outstanding, and proposed issuances and redemptions. These data are not available on other regulatory reports, which are prepared on a Basel I or Basel II basis. Data collected are compared against the balance projections provided annually to monitor the path of BHCs' positions. For BHCs that submitted (in the annual filing) planned actions to meet Basel III targets, the Federal Reserve requires BHCs to submit qualitative responses regarding progress in executing those actions. Combined with the collected data, this qualitative information provides important insight into the BHCs' Basel III and Dodd-Frank preparedness and feasibility of the projections and plans submitted in the annual schedule. These quarterly data are not as granular as the data collected in the annual schedule, collecting only quarterly point-in-time total balances for Tier 1 Common Equity, Tier 1 Capital, RWAs and Leverage Exposures. These data are only collected in quarters in which the annual schedule is not collected.

### **Regulatory Capital Instruments Schedule**

The quarterly Regulatory Capital Instruments schedule requires BHCs to confirm the execution of proposed redemptions and issuances of specific instruments and to identify any deviations from the projections submitted in the annual schedule. This quarterly monitoring effort facilitates the maintaining and updating of the Regulatory Capital Instruments data reported annually in order to support future capital requests and to produce horizontal and BHC-specific reports on the composition of Tier 1 and Tier 2 Capital. These quarterly data are not as granular as the data collected in the annual schedule, and are only collected in quarters in which the annual schedule is not collected.

### **Respondent Panel**

The respondent panel consists of top-tier BHCs domiciled in the United States that have \$50 billion or more in total consolidated assets, as computed pursuant to the Capital Plan rule (12 CFR 225.8). For purposes of the Capital Plan rule, total consolidated assets equal the average total consolidated assets over the previous four calendar quarters, as reflected on the FR Y-9C. This calculation is effective as of the due date of the BHCs' most recent FR Y-9C. A BHC that meets the asset threshold after December 31, 2011, would be subject to the FR Y-14A/Q information collection requirements on the first day of the quarter immediately following the quarter in which it meets this asset threshold, unless otherwise directed by the Federal Reserve.

The rule also applies to any top-tier BHC domiciled in the United States that the Board determines, by order, shall be subject in whole or in part to the rule's requirements based on the institution's size, level of complexity, risk profile, scope of operations, or financial condition.

### ***FR Y-14A/Q Instructions***

The reporting instructions, to the extent appropriate, use definitions already included in the FR Y-9C instructions, and total amounts (for example, total AFS or HTM securities), to the extent appropriate, agree with total amounts reported on the FR Y-9C.

### ***Proposed Revisions***

#### **FR Y-14Q and M**

**Retail Risk Schedule (First Lien Closed-End 1-4 Family Residential Mortgage, Home Equity Residential Mortgage, and Credit Card data collections).** The Federal Reserve proposes increasing the frequency of reporting for three retail portfolios from quarterly to monthly (the proposed FR Y-14M). The current quarterly Retail Risk schedule collects data on several portfolio-level worksheets, including: one domestic closed-end first lien residential mortgage worksheet, two domestic home equity worksheets (domestic closed-end home equity loans and domestic home equity lines of credit), and two domestic credit card worksheets (domestic charge card and domestic small and medium size enterprise (SME) corporate cards). The portfolio-level data collected was highly segmented and provided substantial insight into BHCs' first lien residential, home equity, and credit card portfolios. However, given the micro- and macro-prudential importance of the portfolios and the benefit of more granular information to supervisory model development and risk assessment, the Federal Reserve proposes replacing these quarterly portfolio-level worksheets with the following monthly collections:

- one loan-level collection for *Domestic First Lien Closed-End 1-4 Family Residential Mortgage* data,
- one loan-level collection for *Domestic Home Equity Residential Mortgage* data, and
- one account- and portfolio-level collection for *Domestic Credit Card* data.<sup>13</sup>

For these new retail portfolio collections, the Federal Reserve proposes collecting month-end data on a monthly frequency. Currently, all of the retail risk worksheets collect monthly data on a quarterly frequency, even though the Capital Plan rule allows for the collection of data as frequently as needed. The proposed monthly data collection would improve the Federal Reserve's ability to perform its continuous risk monitoring function by providing more timely data. In a time of crisis or market downturn where risk characteristics could change in an unpredictable manner, monthly data collection would be especially valuable for these retail portfolios with relatively short credit cycles. (For example, a credit card account could go from current to charged-off within one quarter.) Collecting data on a quarterly frequency could hinder the Federal Reserve's ability to respond to issues of immediate supervisory concern or requests from policy makers.

---

<sup>13</sup> In the case of the credit card portfolio, the new collection would gather account data instead of loan data.

Furthermore, BHCs generally produce data and internal risk management reports for these portfolios monthly, and often provide similar data for supervisory purposes on a monthly basis. The Federal Reserve, at this time, does not propose requiring monthly reporting for the other retail portfolios with longer credit cycles, as the burden of reporting at the increased frequency currently outweighs the value of the additional data.

These collections would gather one record per loan. Due to the volume of data that would be collected, these data would not be gathered in Excel worksheets as in the previous quarterly data collection; rather file specifications would be provided to respondents in order to transmit the data, as appropriate.

The proposed *Domestic First Lien Closed-End 1-4 Family Residential Mortgage* collection would gather monthly detailed loan-level data and would capture the following loans:

- all loans in the active inventory as-of the last day of the month;
- all loans in the inventory that were transferred to another servicer during the month; and
- all loans in the inventory that were liquidated during the month.

The reported data items would include: loan number, property information, loan amount, documentation information, loan-to-value and debt-to-income ratios, borrower information, bankruptcy or foreclosure status, and other detailed loan information.

The proposed *Domestic Home Equity Residential Mortgage* collection would gather monthly detailed loan-level data and would capture the following loans:

- all loans in the active inventory as-of the last day of the month;
- all loans in the inventory that were transferred to another servicer during the month; and
- all loans in the inventory that were liquidated during the month.

The reported data items would include: loan number; property information; loan, line, and appraisal amounts; loan documentation information; loan-to-value and debt-to-income ratios; borrower information; bankruptcy or foreclosure status; and other detailed loan information.

In order to match senior and junior lien residential mortgages on the same collateral, the Federal Reserve also proposes gathering additional information (loan number, property and mailing address information, liquidation status, original lien position, and census tract) on the residential mortgage loans reported in the *Domestic First Lien Closed-End 1-4 Family Residential Mortgage* and *Domestic Home Equity Residential Mortgage* collections. By matching senior and junior lien loans by property ID, the Federal Reserve would glean valuable insights into the level of risk of both credits, especially in cases where current (or performing) junior lien loans are behind delinquent first lien loans.

The proposed *Domestic Credit Card* collection would gather monthly detailed account-level data and new portfolio-level data. The account-level collection would capture detailed data regarding domestic credit cards: general purpose credit cards<sup>14</sup>, private label credit cards<sup>15</sup>,

---

<sup>14</sup> General purpose credit cards can be used at a wide variety of merchants, including any who accept MasterCard, Visa, American Express or Discover credit cards. Affinity and co-brand cards should be included in this category,

business credit cards<sup>16</sup>, and corporate credit cards<sup>17</sup>. The portfolio-level data would capture key information about portfolio characteristics including information that is unlikely to be captured at the account-level. (For example, certain collection costs are not typically assigned at the account-level.) The portfolio-level data would be primarily relevant for pools of credit card loans rather than individual accounts.

Like the other new retail collections, the proposed *Domestic Credit Card* collection would collect mandatory data. However, some data items that are not directly available would be permitted to be reported on a best effort basis. For example, if the BHCs do not use the data in the course of their risk management practices or otherwise generate or store the data, they would not be required to generate the data for this collection.

## FR Y-14Q

**Wholesale Risk Schedule (CRE and Corporate Loan data collections).** The current corporate loan collection gathers loan-level data that focuses on data stored in BHCs' systems of records, particularly their loan accounting systems. While the granular loan-level data provides additional insights into certain credit risk characteristics, the data items in the initial FR Y-14Q collection were not sufficient to evaluate all aspects of credit risk or produce an independent probability of default (PD). In order to better understand the credit risk associated with BHCs' corporate loan exposures, the Federal Reserve proposes adding approximately 35 data items to the collection. These data items would allow the Federal Reserve to derive an independent PD for both public and private firms and better track underwriting standards and emerging risks in BHCs' loan portfolios. To reduce the burden of reporting the additional data items, the Federal Reserve also proposes allowing BHCs to exclude from reporting (or make optional the reporting of) obligor financial data (data items 51-79) for loans extended to an obligor (1) domiciled outside of the U.S.; (2) that is a natural person, a non-profit federal, state or local governmental agency; or (3) that has a NAICS industry code<sup>18</sup> beginning with 52 (Finance and Insurance) or 5312 (Real Estate Agents and Brokers).

In addition, the Federal Reserve proposes amending the scope of loans in the corporate loan collection to include owner-occupied non-farm, non-residential (NFNR) CRE loans (reported on the FR Y-9C, Schedule HC-C 1.e(1)). These loans, currently reported in the CRE collection, would be moved to the corporate loan collection so overall this does not represent an expansion of the wholesale collection. The data items gathered in the corporate loan collection better capture the elements indicative of risk in owner-occupied NFNR CRE loans than those in

---

and student cards if applicable. This credit card type includes loans reported on line 6.a of schedule HC-C of the FR Y-9C.

<sup>15</sup> Private label credit cards, also known as proprietary credit cards, are tied to the retailer issuing the card and can only be used in that retailer's stores. Oil & gas cards should be included in this loan type, and student cards if applicable. This credit card type includes loans reported on line 6.a of schedule HC-C of the FR Y-9C.

<sup>16</sup> Business credit cards include small business credit card accounts where the loan is underwritten with the sole proprietor or primary business owner as the applicant. This credit card type includes SME credit card loans that are reported on line 4.a of schedule HC-C of the FRY-9C.

<sup>17</sup> Corporate credit cards are employer-sponsored credit cards for use by a company's employees. This credit card type includes US corporate credit card loans that are reported on line 4.a of schedule HC-C of the FRY-9C.

<sup>18</sup> The North American Industry Classification System is used by business and government to classify business establishments according to type of economic activity (process of production) in Canada, Mexico, and the U.S.

the CRE collection. The Federal Reserve proposes revisions to the corporate loan data collection to clarify definitions of existing data items and request additional detail about collateral securing a facility.

The Federal Reserve also proposes revising the CRE data collection to add a non-accrual data item and to modify the loan status data item to include the number of days past due. These revisions to the CRE data collection would allow the Federal Reserve to better model the credit risk of CRE loans and these data would be readily available in BHCs' loan servicing systems.

**Operational Risk Schedule.** The current FR Y-14A *Operational Risk worksheets* (contained within the annual Summary schedule) collect BHCs' projections for operational losses.<sup>19</sup> Additional detail is also collected on translating historical loss experience into operational loss projections and on budgeting processes used to project operational losses.

During the drafting of the September 2011 proposal implementing the FR Y-14A/Q, the Federal Reserve was aware of the need to also collect actual operational loss data on a quarterly basis; however, more time was needed in order to conduct a comprehensive analysis before determining the appropriate data items that would be collected. As part of that analysis, the Federal Reserve reviewed the reporting requirements in Schedule S (Operational Risk) of the interagency *Advanced Capital Adequacy Framework Regulatory Reporting Requirements* (FFIEC 101; OMB No. 7100-0319) to determine the data items collected and the level of granularity to which they are collected. The data collected on Schedule S is summary or aggregate-level information, while the FR Y-14Q proposed schedule requests data on an individual loss event level. Based on the analysis conducted, the Federal Reserve proposes a new quarterly operational loss data collection. The data collected would include the type of loss event, when it occurred, the loss amount, the business line in which it occurred, and other relevant information. Obtaining these data on an individual loss event level would help achieve key objectives that could otherwise not be effectively realized with summary level data only and would enhance the Federal Reserve's ability to (1) assess the BHCs' operational loss exposures in relation to the risks faced by the BHCs and (2) ensure safety and soundness. These data would also be used to develop and calibrate supervisory stress test models, evaluate the projections that BHCs submit as part of the FR Y-14A, and support continuous monitoring and analysis of BHCs operational loss activity and trends. These data are not currently available on a standardized basis.

### **FR Y-14 A, Q, and M**

**Respondent Panel Revisions.** As mentioned above, the Capital Plan rule, which contains the authority for these reporting requirements, applies to large BHCs. As of September 30, 2011, there were approximately 34 large BHCs. The asset threshold of \$50 billion is consistent with the threshold established by section 165 of the Dodd-Frank Act relating to enhanced supervision and prudential standards for certain BHCs. Therefore, the Federal Reserve proposes to expand the scope of the respondent panel required to complete the reporting

---

<sup>19</sup> A one-time collection of historical operational loss data was collected in early-January 2012.

schedules and worksheets to include all BHCs subject to the Capital Plan rule, except for SR 01-01 firms.<sup>20</sup>

### **Sensitive Questions**

This collection of information contains no questions of a sensitive nature, as defined by OMB guidelines.

### **Consultation Outside the Agency**

There has been no formal consultation outside the Federal Reserve System; however, the Federal Reserve has had informal conversations with the Office of the Comptroller of the Currency (OCC) about similar information collections conducted by the OCC. During the public comment period for the FR Y-14A/Q implementation proposal, technical, clarifying questions related to the proposed schedules were submitted to the Federal Reserve via an e-mail account that was specifically established for questions related to the proposal. Also, during the 2012 CCAR exercise, BHCs subject to the reporting requirements of the exercise were able to submit technical, clarifying questions to a similar e-mail account. It is anticipated that going forward the Federal Reserve would continue to engage respondents through such an e-mail account to track questions to ensure timely feedback, log the questions, and evaluate any issues suggesting the need for revisions to the collection or clarifications to the reporting instructions.

On February 22, 2012, the Federal Reserve published a notice in the *Federal Register* (77 FR 10525) requesting public comment on the proposed information collection. The comment period for this notice expires on April 23, 2012.

### **Time Schedule for Information Collection and Publication**

**Publication.** In connection with the overall implementation of the CCAR, the Federal Reserve is likely, in the future, to release results of the supervisory stress testing associated with CCAR.

**Time Schedule.** The following table outlines by risk factor (schedules and sub-worksheets) the as-of dates for the data and the due date for the submissions to the Federal Reserve by reporting frequency (annually, quarterly, or monthly).

---

<sup>20</sup> SR 01-01 (Application of the Board's Capital Adequacy Guidelines to BHCs owned by Foreign Banking Organizations) states, "as a general matter, a U.S. BHC that is owned and controlled by a foreign bank that is an FHC that the Board has determined to be well-capitalized and well-managed will not be required to comply with the Board's capital adequacy guidelines."



Risk Factor Schedules and Sub-Worksheets	Data as-of-date	Submission due to Federal Reserve
<b>FR Y-14A (Annual Filings)</b>		
<b>Basel III/Dodd-Frank Schedule</b> <b>Regulatory Capital Instruments Schedule</b> <b>Macro Scenario Schedule</b> <b>Summary Schedule</b> <ul style="list-style-type: none"> <li>• Balance Sheet</li> <li>• Income Statement</li> <li>• Capital</li> <li>• Retail Risk</li> <li>• Operational Risk</li> <li>• Securities Risk</li> <li>• PPNR</li> </ul>	Data as-of September 30	Data due January 5 of the following year.
<u>Market Shock exercise</u> <b>Summary Schedule</b> <ul style="list-style-type: none"> <li>• Trading Risk</li> <li>• CCR</li> </ul> <b>CCR Annual Schedule</b>	Data as-of a specified date in the 4 <sup>th</sup> quarter.  As-of-date would be communicated during the 4 <sup>th</sup> quarter after it had occurred.	Data due January 5 of the following year.
<b>FR Y-14Q (Quarterly Filings)</b>		
<b>Securities Risk Schedule</b> <b>PPNR Schedule</b> <b>Retail Risk Schedule</b> <b>Wholesale Risk Schedule</b> <b>Operational Risk Schedule</b>	Data as of each quarter end	Same as FR Y-9C reporting schedule: Reported data (40 calendar days after the calendar quarter-end for March, June, and September and 45 calendar days after the calendar quarter-end for December).
<b>Basel III/Dodd-Frank Schedule</b> <b>Regulatory Capital Instruments Schedule</b>	Data as of each quarter end  Quarterly data reported for the <b>first, second, and fourth quarters ONLY.</b>	Same as FR Y-9C reporting schedule
<b>Trading Risk Schedule</b>	Data as of quarter end for <b>first, second, and fourth quarters.</b>  Due to the fact that the 3 <sup>rd</sup> quarter data is part of the Market Shock exercise, the as-of-date for the 3 <sup>rd</sup> quarter would be communicated during the 4 <sup>th</sup> quarter after it had occurred.	Same as FR Y-9C reporting schedule  The 3 <sup>rd</sup> quarter data would be due 40 calendar days after the notification date (notifying respondents of the as-of-date) or December 15, whichever comes earlier. BHCs may provide these data as-of the most recent date that corresponds to their weekly internal risk reporting cycle as long as it falls before the as-of-date.
<b>FR Y-14M (Monthly Filings)</b>		
<b>Retail Risk Schedule</b> <ul style="list-style-type: none"> <li>• Domestic Home Equity Residential Mortgage</li> <li>• Domestic First Lien Closed-end 1-4 Family Residential Mortgage</li> <li>• Domestic Credit Card</li> </ul>	Data as-of the last business day of each calendar month	Reported data due by the 30 <sup>th</sup> calendar day of the following month

## **Legal Status**

The Board's Legal Division determined that the information collection is authorized by section 165 of the Dodd-Frank Act, which requires the Board to ensure that certain BHCs and nonbank financial companies supervised by the Board are subject to enhanced risk-based and leverage standards in order to mitigate risks to the financial stability of the United States (12 U.S.C. § 5365). Additionally, section 5 of the Bank Holding Company Act authorizes the Board to issue regulations and conduct information collections with regard to the supervision of BHCs (12 U.S.C. § 1844).

As these data are collected as part of the supervisory process, they are subject to confidential treatment under exemption 8 of the Freedom of Information Act (5 U.S.C. § 552(b)(8)). In addition, commercial and financial information contained in these information collections may be exempt disclosure under exemption 4 (5 U.S.C. § 552(b)(4)). Such exemptions would be made on a case-by-case basis.

## **Estimate of Cost to the Federal Reserve System**

The cost estimate for the Federal Reserve System will be obtained.

## **Estimate of Respondent Burden**

The current total annual burden for the annual and quarterly reporting requirements of this information collection is estimated to be 553,629 hours. The proposed revisions would increase the total annual burden for this information collection by 401,073 hours, for a total of 954,702 hours, as shown in the tables below. The proposed annual burden for the FR Y-14A, Q, and M would represent approximately 7.57 percent of total Federal Reserve System paperwork burden.

### **FR Y-14A Burden**

The burden for each BHC that would complete the annual Summary schedule is estimated to be 820 hours for a total of 24,600 hours. This burden includes 20 hours to input these data and 800 hours for work related to modeling efforts. The estimated burden for each BHC that would complete the annual Macro Scenario schedule is estimated to be 31 hours for a total of 930 hours. This burden estimate includes 5 hours to input baseline scenario data and 13 hours inputting data for the baseline and stress scenarios. The burden for the six BHCs<sup>21</sup> that would complete the CCR schedule would vary across BHCs, ranging from 123 hours to 640 hours. On average the annual burden per BHC is estimated to be 382 hours for a total of 2,292 hours. The estimated burden for each BHC that would complete the annual Basel III/Dodd-Frank schedule is 20 hours for a total of 600 hours. The estimated burden for each BHC that

---

<sup>21</sup> These six BHCs (that submit data on the CCR and Trading Risk schedules) were identified as the largest derivative dealers based on notional value (representing an indicator of volume) and credit exposure as defined under the Basel I regulatory definition (as a proxy for the risk that OTC derivatives pose to the BHC). The six BHCs represented over 95 percent of U.S. notional and gross mark-to-market of OTC derivatives exposure in 2009 based on data submitted on the FR Y-9C).

would complete the Regulatory Capital Instruments annual schedule is 20 hours for a total of 600 hours. The total estimated burden for the FR Y-14A schedules is 29,022 hours.

### **FR Y-14Q Burden**

The burden for each BHC that would complete the Securities Risk schedule is estimated to be 10 hours per quarter for a total of 1,200 hours. The data schedule has been designed based on how some BHCs report their information internally. The burden for each BHC that would complete the Retail Risk schedule would vary across BHCs and for each worksheet within the Retail Risk schedule it would take approximately 380 hours to complete. On average the quarterly burden per BHC would be 3,800 hours for a total of 456,000 hours.

The burden for each BHC that would complete the PPNR Risk schedule would vary across BHCs, ranging from 360 hours to 1,200 hours. On average the quarterly burden per BHC would be 625 hours for a total of 75,000 hours. The reporting burden would vary in part based on the diversity operations and the structure and capability of internal reporting systems. Some BHCs may report the data for only a few business lines, while others with more diversified operations may need to complete the majority of the data items. Additionally, not all BHCs would provide supplemental information on net interest income.

The total annual burden for the BHCs that would complete the quarterly Wholesale Risk schedule is estimated to be 13,200 hours. This burden estimate includes 60 hours for each corporate loan respondent and 60 hours for each CRE respondent to complete the data submission.

The burden for each BHC that would complete the Trading Risk schedule would vary across BHCs, ranging from 800 hours to 2,640 hours. On average the quarterly burden per BHC would be 1,720 hours for a total of 41,280 hours. The burden for each BHC that would complete the Basel III/Dodd-Frank schedule (for the first, second, and fourth quarters only) would take on average 20 hours to complete for a total of 1,800 hours. The estimated burden for each BHC that would complete the Regulatory Capital Instruments schedule (for the first, second, and fourth quarters only) is 40 hours for a total of 3,600 hours.

The total annual burden for the BHCs that would complete the proposed quarterly Operational Risk schedule is estimated to be 3,360 hours. On average the quarterly burden per BHC would be 28 hours. The total estimated burden for the FR Y-14Q schedules is 595,440 hours.

### **FR Y-14M Burden**

The burden for each BHC that would complete the three monthly retail portfolio collections would vary across BHCs, on average it would take approximately 430 hours to complete each collection per month. The total burden for the BHCs that would complete the proposed monthly *Domestic First Lien Closed-End Residential Mortgage* collection is estimated to be 129,000 hours. The total burden for the BHCs that would complete the proposed monthly *Domestic Home Equity Residential Mortgage* collection is estimated to be 123,840 hours. The

total burden for the BHCs that would complete the proposed monthly *Domestic Credit Card* collection is estimated to be 77,400 hours. The total estimated burden for the FR Y-14M collections is 330,240 hours.

The current total annual cost to the public for the FR Y-14 information collection is estimated to be \$24,027,499 and would increase by \$17,406,568, to \$41,434,067 for the revised FR Y-14.<sup>22</sup>

	<i>Number of respondents<sup>23</sup></i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
<b><u>Current FR Y-14A</u></b>				
Summary	19	1	820	15,580
Macro scenario	19	1	31	589
CCR	6	1	382	2,292
Basel III/Dodd-Frank	19	1	20	380
Regulatory capital instruments	19	1	20	<u>380</u>
<i>Current FR Y-14A total</i>				<u>19,221</u>
<b><u>Current FR Y-14Q</u></b>				
Securities risk	19	4	10	760
Retail risk	19	4	5,683	431,908
PPNR risk	19	4	625	47,500
Wholesale risk				
• Corporate loans	16	4	60	3,840
• CRE	19	4	60	4,560
Trading risk	6	4	1,720	41,280
Basel III/Dodd-Frank	19	4	20	1,520
Regulatory capital instruments	19	4	40	<u>3,040</u>
<i>Current FR Y-14Q total</i>				<u>534,408</u>
<i>Current total</i>				<u>553,629</u>

<sup>22</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rate (30% Office & Administrative Support @ \$16, 45% Financial Managers @ \$50, 15% Legal Counsel @ \$54, and 10% Chief Executives @ \$80). Hourly rate for each occupational group are the median hourly wages (rounded up) from the Bureau of Labor and Statistics (BLS), Occupational Employment and Wages 2010, [www.bls.gov/news.release/ocwage.nr0.htm](http://www.bls.gov/news.release/ocwage.nr0.htm) Occupations are defined using the BLS Occupational Classification System, [www.bls.gov/soc/](http://www.bls.gov/soc/)

<sup>23</sup> Of the 19 respondents required to comply with this information collection, none are small entities as defined by the Small Business Administration (*i.e.*, entities with less than \$175 million in total assets) [www.sba.gov/contractingopportunities/officials/size/table/index.html](http://www.sba.gov/contractingopportunities/officials/size/table/index.html).

	<i>Number of respondents<sup>24</sup></i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
<b><u>Proposed FR Y-14A</u></b>				
Summary	30	1	820	24,600
Macro scenario	30	1	31	930
CCR	6	1	382	2,292
Basel III/Dodd-Frank	30	1	20	600
Regulatory capital	30	1	20	<u>600</u>
<i>Proposed FR Y-14A total</i>				<u>29,022</u>
<b><u>Proposed FR Y-14Q</u></b>				
Securities risk	30	4	10	1,200
Retail risk	30	4	3,800	456,000
PPNR risk	30	4	625	75,000
Wholesale risk				
• Corporate loans	28	4	60	6,720
• CRE	27	4	60	6,480
Trading risk	6	4	1,720	41,280
Basel III/Dodd-Frank -1 <sup>st</sup> , 2 <sup>nd</sup> , & 4 <sup>th</sup> Qtrs	30	3	20	1,800
Regulatory capital -1 <sup>st</sup> , 2 <sup>nd</sup> , & 4 <sup>th</sup> Qtrs	30	3	40	3,600
Operational risk	30	4	28	<u>3,360</u>
<i>Proposed FR Y-14Q total</i>				<u>595,440</u>
<b><u>Proposed FR Y-14M</u></b>				
Retail risk				
• 1 <sup>st</sup> lien mortgage	25	12	430	129,000
• Home equity	24	12	430	123,840
• Credit card	15	12	430	<u>77,400</u>
<i>Proposed FR Y-14M total</i>				<u>330,240</u>
<i>Proposed collection total</i>				<u>954,702</u>

<sup>24</sup> Of the 30 respondents required to comply with this information collection, none are small entities as defined by the Small Business Administration (*i.e.*, entities with less than \$175 million in total assets) [www.sba.gov/contractingopportunities/officials/size/table/index.html](http://www.sba.gov/contractingopportunities/officials/size/table/index.html).