

Summary of Legitimate Interseries Differences

between the

Report of Transaction Accounts, Other Deposits and Vault Cash  
(FR 2900)

and the

Consolidated Reports of Condition and Income for a Bank with Domestic and Foreign Offices  
(FFIEC 031)

or

Consolidated Reports of Condition and Income for a Bank with Domestic Offices Only  
(FFIEC 041)

or

Consolidated Reports of Condition and Income for a Bank with Domestic Offices Only and Total Assets  
Less than \$1 Billion  
(FFIEC 051)

**Commercial Banks**  
**State Chartered Cooperative Banks**  
**State Chartered Savings Banks**  
**Federally Chartered Savings Banks**  
**Savings and Loan Associations**  
**Federally Chartered Cooperative Banks**

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## Background

“Interseries editing” compares data reported as of similar dates for analogous items from two different reports. Interseries editing enhances data quality by reconciling reporting discrepancies. Such discrepancies may be the result of a reporting error or may instead reflect legitimate differences between item definitions associated with the two reports. This document describes legitimate differences between the **Report of Transaction Accounts, Other Deposits and Vault Cash (FR 2900)** and the **Consolidated Reports of Condition and Income (FFIEC 031, 041, and 051)**, hereafter referred to in this document as the Call Report.

Interseries edits are performed each quarter for each FFIEC 031, 041, and 051 reporter (commercial banks, state chartered cooperative banks, state chartered savings banks, federally chartered savings banks, savings and loan associations, and federally chartered cooperative banks) that files the FR 2900. For weekly FR 2900 reporters, interseries edits are based on a single day’s data from the two reports on the Call Report date; for quarterly FR 2900 reporters, interseries edits are based on weekly-average FR 2900 data reported for a given quarter and single-day Call Report data for that same quarter. The interseries edit tolerance amounts for FR 2900 quarterly reporters are wider than they would be for weekly reporters to take this timing difference into account. Consequently, for quarterly FR 2900 reporters, “timing difference” would generally explain a large interseries edit discrepancy in unusual cases only.

A table showing all of the interseries item comparisons that are calculated each quarter is shown in the next section, followed by a table summarizing most of the legitimate differences that might arise in reconciling those comparisons. Next, two types of legitimate differences are discussed in detail: *general legitimate differences* that are valid for any item comparison, and *specific legitimate differences* that are valid only for the particular items being compared.

## Interseries Edits for FFIEC 031, 041, and 051 Reporters

The following table shows the interseries item comparisons calculated each quarter for all FFIEC 031, 041, and 051 reporters that file the FR 2900 report, either weekly or quarterly.

Detailed Interseries Item Comparisons for FFIEC 031, 041, and 051 Reporters			
FR 2900		FFIEC 031, 041, and 051	
Line	Description	Code	Description
A.1.a + A.1.b + A.1.c	Total demand deposits: Demand deposits due to DIs + Demand deposits of US Government + Other demand deposits	RCON2210	RC-E, column B, line 7 (Total demand deposits)
A.2	ATS accounts and NOW accounts/share drafts, etc.	RCON2215 – RCON2210	RC-E, column A, line 7 (Total transaction accounts) – RC-E, column B, line 7 (Total demand deposits)
A.3	Total transaction accounts	RCON2215	RC-E, column A, line 7 (Total transaction accounts)
B.1 + B.2 + E.1 <sup>1</sup>	Demand balances due from DIs + Cash items in process of collection + Vault cash <sup>1</sup>	RCON0081 <sup>1</sup>	RC, line 1.a (Noninterest-bearing balances & currency and coin) <sup>1</sup>
B.2 <sup>2</sup>	Cash items in process of collection <sup>2</sup>	RCON0020 <sup>2</sup>	RC-A, line 1.a (CIPC) <sup>2</sup>
C.1	Total savings deposits	RCON6810 + RCON0352	RC-E, memo 2.a.(1) (MMDAs) + RC-E, memo 2.a.(2) (Other savings deposits)
E.1 <sup>2</sup>	Vault cash <sup>2</sup>	RCON0080 <sup>2</sup>	RC-A, line 1.b (Currency and coin) <sup>2</sup>
F.1	Large time deposits	RCONJ473 + RCONJ474	RC-E, memo 2.c (Time deposits of \$100,000 through \$250,000) + RC-E, memo 2.d (Time deposits of more than \$250,000)
D.1 – F.1	Small time deposits: Total time deposits – Large time deposits	RCON6648	RC-E, memo 2.b (Time deposits less than \$100,000)
A.3 + C.1 + D.1	Total deposits: Total transaction accounts + Total savings deposits + Total time deposits	RCON2215 + RCON2385	RC-E, column A, line 7 (Total transaction accounts) + RC-E, column C, line 7 (Total nontransaction accounts)

<sup>1</sup> This edit is performed only for FFIEC 041 and 051 reporters.

<sup>2</sup> This edit is performed for FFIEC 031 reporters, only those FFIEC 041 reporters that file schedule RC-A (institutions with total assets of \$300 million or more), and only those FFIEC 051 reporters that file schedule RC-A (institutions with total assets of \$300 million or more) semi-annually in June and December.

Summary of Legitimate Differences for FFIEC 031, 041, and 051 Reporters	
FR 2900 <i>less than</i> Call Report	FR 2900 <i>greater than</i> Call Report
<i>Total Demand Deposits</i>	
<ul style="list-style-type: none"> <li>FR 2900 item excludes the difference between the full face amount of installment notes acquired and the amount actually credited to the dealer (dealer reserves), while the Call Report item includes this difference.</li> <li>FR 2900 item excludes correspondent pass-through reserve balances, while the Call Report item includes them.</li> </ul>	<ul style="list-style-type: none"> <li>FR 2900 item includes primary obligations with original maturities of less than seven days (including ASC Topic 810 (formerly FIN 46)-related balances that are considered deposits). The Call Report item <i>does not</i> include primary obligations.</li> <li>FR 2900 reciprocal balances are reported <i>gross</i> for certain counterparties, while Call Report reciprocal balances may be reported <i>net</i> regardless of the counterparty.</li> <li>FR 2900 item includes teller's checks for <i>more days</i> than the Call Report (FR 2900 includes balances from the time of issuance until the teller's check is paid, while the Call Report removes the deposit when it is remitted to the service provider).</li> <li>FR 2900 item includes demand balances due to related Edge and agreement corporations, while the Call Report item does not.</li> <li>FR 2900 item includes deposits received from a <i>non-U.S.</i> office of an <i>affiliate</i>, while the Call Report item does not.</li> <li>FR 2900 item includes certain deposits at <i>non-U.S. branches</i> of the reporting institution, while the Call Report item does not.</li> <li>FR 2900 item considers an overdrawn account that is pooled in a commingled trust account as having a zero balance, while the Call Report item reflects the actual negative balance for that account.</li> </ul>
<i>ATS and NOW Accounts</i>	
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

<b>Summary of Legitimate Differences for FFIEC 031, 041, and 051 Reporters, <i>continued</i></b>	
<b>FR 2900 <i>less than</i> Call Report</b>	<b>FR 2900 <i>greater than</i> Call Report</b>
<i>Total Transaction Accounts</i>	
<ul style="list-style-type: none"> <li>FR 2900 item excludes the difference between the full face amount of installment notes acquired and the amount actually credited to the dealer (dealer reserves), while the Call Report item includes this difference.</li> <li>FR 2900 item excludes correspondent pass-through reserve balances, while the Call Report item includes them.</li> </ul>	<ul style="list-style-type: none"> <li>FR 2900 item includes primary obligations with original maturities of less than seven days (including ASC Topic 810 (formerly FIN 46)-related balances that are considered deposits). The Call Report item <i>does not</i> include primary obligations.</li> <li>FR 2900 reciprocal balances are reported <i>gross</i> for certain counterparties, while Call Report reciprocal balances may be reported <i>net</i> regardless of counterparty.</li> <li>FR 2900 includes teller's checks for <i>more days</i> than the Call Report (FR 2900 includes balances from the time of issuance until the teller's check is paid, while the Call Report removes the deposit when it is remitted to the service provider).</li> <li>FR 2900 item includes balances due to related Edge and agreement corporations, while the Call Report item does not.</li> <li>FR 2900 item includes deposits received from a <i>non-U.S.</i> office of an <i>affiliate</i>, while the Call Report item does not.</li> <li>FR 2900 item includes certain deposits at <i>non-U.S. branches</i> of the reporting institution, while the Call Report item does not.</li> <li>FR 2900 item considers an overdrawn account that is pooled in a commingled trust account as having a zero balance, while the Call Report item reflects the actual negative balance for that account.</li> </ul>
<i>Demand Balance Due from DIs + Cash Items in Process of Collection + Vault Cash</i>	
<ul style="list-style-type: none"> <li>FR 2900 item only includes balances subject to <i>immediate</i> withdrawal by the reporting institution, while the Call Report item may include balances not subject to immediate withdrawal.</li> <li>FR 2900 item does not include demand balances due from Federal Home Loan Banks, while the Call Report item includes these balances.</li> <li>FR 2900 item excludes respondent pass-through reserve balances, while the Call Report item may include them.</li> <li>FR 2900 item only includes balances due from depository institutions <i>in the U.S.</i>, while the Call Report item may include balances due from depository institutions <i>outside the U.S.</i></li> <li>FR 2900 item excludes items payable immediately upon presentation to a depository institution in Puerto Rico or the U.S. territories and possessions, while the Call Report item does not.</li> <li>FR 2900 item excludes vault cash in the form of</li> </ul>	<ul style="list-style-type: none"> <li>FR 2900 reciprocal balances are reported <i>gross</i> for certain counterparties, while Call Report reciprocal balances may be reported <i>net</i> regardless of counterparty.</li> <li>FR 2900 item includes demand balances due from related Edge and agreement corporations, while the Call Report item does not.</li> <li>FR 2900 item includes respondent pass-through excess balances, while the Call Report item may not.</li> <li>FR 2900 item includes interest-bearing demand balances, while the Call Report item does not.</li> </ul>

<i>foreign</i> currency, while the Call Report item does not.	
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<b>Summary of Legitimate Differences for FFIEC 031, 041, and 051 Reporters, <i>continued</i></b>	
<b>FR 2900 <i>less than</i> Call Report</b>	<b>FR 2900 <i>greater than</i> Call Report</b>
<i>Cash Items in Process of Collection</i>	
<ul style="list-style-type: none"> <li>FR 2900 item excludes items payable immediately upon presentation to a depository institution in Puerto Rico or the U.S. territories and possessions, while the Call Report item does not.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<i>Total Savings Deposits</i>	
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>FR 2900 item includes primary obligations in the form of savings deposits, while the Call Report items <i>do not</i> include primary obligations.</li> <li>FR 2900 item includes balances due to related Edge and agreement corporations, while the Call Report item does not.</li> <li>FR 2900 item includes deposits received from a <i>non-U.S.</i> office of an <i>affiliate</i>, while the Call Report item does not.</li> <li>FR 2900 item includes certain deposits at <i>non-U.S. branches</i> of the reporting institution, while the Call Report item does not.</li> </ul>
<i>Vault Cash</i>	
<ul style="list-style-type: none"> <li>FR 2900 item excludes vault cash in the form of <i>foreign</i> currency, while the Call Report item does not.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
<i>Large Time Deposits</i>	
<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>FR 2900 item includes primary obligations with original maturities of seven days or more (including ASC Topic 810 (formerly FIN 46)-related balances that are considered deposits). The Call Report item <i>does not</i> include primary obligations.</li> <li>FR 2900 item includes balances due to related Edge and agreement corporations, while the Call Report item does not.</li> <li>FR 2900 item includes deposits received from a <i>non-U.S.</i> office of an <i>affiliate</i>, while the Call Report item does not.</li> <li>FR 2900 item includes certain deposits at <i>non-U.S. branches</i> of the reporting institution, while the Call Report item does not.</li> </ul>

<b>Summary of Legitimate Differences for FFIEC 031, 041, and 051 Reporters, <i>continued</i></b>	
<b>FR 2900 <i>less than</i> Call Report</b>	<b>FR 2900 <i>greater than</i> Call Report</b>
<i>Small Time Deposits</i>	
<ul style="list-style-type: none"> <li>• None.</li> </ul>	<ul style="list-style-type: none"> <li>• FR 2900 item includes primary obligations with original maturities of seven days or more (including ASC Topic 810 (formerly FIN 46)-related balances that are considered deposits). The Call Report item <i>does not</i> include primary obligations.</li> <li>• FR 2900 item includes balances due to related Edge and agreement corporations, while the Call Report item does not.</li> <li>• FR 2900 item includes deposits received from a <i>non-U.S.</i> office of an <i>affiliate</i>, while the Call Report item does not.</li> <li>• FR 2900 item includes certain deposits at <i>non-U.S. branches</i> of the reporting institution, while the Call Report item does not.</li> </ul>
<i>Total Deposits</i>	
<ul style="list-style-type: none"> <li>• FR 2900 item excludes the difference between the full face amount of installment notes acquired and the amount actually credited to the dealer (dealer reserves), while the Call Report item includes this difference.</li> <li>• FR 2900 item excludes correspondent pass-through reserve balances, while the Call Report item includes them.</li> </ul>	<ul style="list-style-type: none"> <li>• FR 2900 item includes primary obligations (including ASC Topic 810 (formerly FIN 46)-related balances that are considered deposits). The Call Report item <i>does not</i> include primary obligations.</li> <li>• FR 2900 reciprocal balances are reported <i>gross</i> for certain counterparties, while Call Report reciprocal balances may be reported <i>net</i> regardless of counterparty.</li> <li>• FR 2900 item includes teller's checks for <i>more days</i> than the Call Report (FR 2900 includes balances from the time of issuance until the teller's check is paid, while the Call Report removes the deposit when it is remitted to the service provider).</li> <li>• FR 2900 item includes balances due to related Edge and agreement corporations, while the Call Report item does not.</li> <li>• FR 2900 item includes deposits received from a <i>non-U.S.</i> office of an <i>affiliate</i>, while the Call Report item does not.</li> <li>• FR 2900 item includes certain deposits at <i>non-U.S. branches</i> of the reporting institution, while the Call Report item does not.</li> <li>• FR 2900 item considers an overdrawn account that is pooled in a commingled trust account as having a zero balance, while the Call Report item reflects the actual negative balance for that account.</li> </ul>

Note: This table excludes late adjustments and interpretive differences because these legitimate differences are circumstance specific.



## General Legitimate Differences

The following legitimate differences may apply to any interseries item comparison.

### Consolidation

Banking Edge and agreement subsidiaries of the reporting bank are required to file separate FR 2900 reports and therefore *are not* consolidated on the FR 2900. As a result, deposits by the parent commercial bank at its Edge subsidiary, or those of the Edge subsidiary at its parent commercial bank, are reported in “Due from” or “Due To” on the FR 2900, as appropriate. (See the FR 2900 General Instructions, “Consolidation.”) In contrast, Edge and agreement subsidiaries *are* consolidated on the reporting bank’s Call Report, and therefore deposits by the parent bank at its Edge subsidiary or those by the Edge subsidiary at its parent bank are *eliminated* by consolidation. (See Call Report General Instructions, “Scope of the ‘Consolidated Bank’ Required to be Reported in the Submitted Reports” and “Rules of Consolidation.” Also see Glossary definition of “Domestic Offices.”)

Deposits received from a *non-U.S.* office of an *affiliate* are included in the FR 2900, but are eliminated in the consolidation process from the domestic portion of the Call Report. (See the FR 2900 General Instructions, “Consolidation,” and the “Glossary of Terms” entry for “Affiliate.”)

Certain deposits at non-U.S. branches of the reporting institution are included in the FR 2900, but are eliminated in the consolidation process from the domestic portion of the Call Report. (See the FR 2900 General Instructions, “Consolidation.”) These deposits include:

- those payable at a U.S. office
- those for which the depositor is guaranteed payment at a U.S. office
- any deposit of a U.S. resident in a denomination of less than \$100,000, regardless of where payable.

### Definition of United States

A legitimate difference may arise between the FR 2900 and the Call Report relating to the definition of United States. The FR 2900 defines United States to include the fifty states and the District of Columbia; by comparison, the Call Report definition is much broader and covers offices in Puerto Rico and U.S. territories and possessions. (See the Call Report entry “Banks, U.S. and Foreign” for additional details.)

### Late Adjustments

Differences between FR 2900 and Call Report items frequently result from timing differences in the preparation of the two reports.

The FR 2900 is usually prepared a day or two after the report as-of date, while the Call Report is typically prepared weeks after its as-of date. As a result, Call Report items correctly include “late adjustment” amounts. The inclusion of late adjustments in Call Report values may make the FR 2900 item larger or smaller than corresponding Call Report item, depending on the type of late adjustments that were made and the items being compared.

The FR 2900 report should be revised to reflect late adjustments that are material. Single-day FR 2900 data for the Call Report date should not automatically be revised merely to match the Call Report.

## Suspense Accounts

Differences between FR 2900 and Call Report items result from the reporting of suspense accounts. Suspense accounts are temporary holding accounts in which items are carried until their final disposition is determined. The FR 2900 requires all suspense account items to be reported in other demand deposits, unless past experience supports a more accurate classification. The Call Report requires these items to be reported in their final disposition account type. For example, suspense account items are reported on the Call Report as if they had actually been posted to the general ledger at or before the cutoff time. The inclusion of suspense account items to the general ledger on the Call Report may make the FR 2900 item larger than the corresponding Call Report item, depending on the classification of the suspense account item.

## Primary Obligations

Deposit balances on the FR 2900 may include primary obligations while deposit balances on the Call Report do not.

Certain liabilities of the reporting institution issued to nonexempt entities (e.g., nondepositories, such as individuals or businesses) are considered primary obligations. Except for a special class of due bills, similar liabilities issued to exempt entities (e.g., depository institutions) are not considered primary obligations. Primary obligations are reported as deposits on the FR 2900 because they are subject to reserve requirements and are considered part of the monetary aggregates. On the Call Report, however, primary obligations are not reported as deposits. Examples of primary obligations include: medium term notes, commercial paper issued by a depository institutions, bank notes, and repurchase agreements not backed by U.S. government (or agency) securities.

*Primary obligations related to ASC Topic 810 (formerly FIN 46):* Some liabilities related to the Financial Accounting Standards Board Accounting Standards Codification (ASC) Topic 810 (formerly Financial Accounting Standards Board Interpretation Number 46 (FIN 46)) are considered primary obligations and are therefore reported on the FR 2900.

ASC Topic 810 (formerly FIN 46), “Consolidation of Variable Interest Entities,” requires depository institutions that sponsor variable-interest entities to consolidate the assets and liabilities of some of these entities onto their balance sheets.

Board Legal staff issued an opinion in January 2004 that certain liabilities of asset-backed commercial paper conduits are not “deposits” for the purposes of Regulation D and, therefore, should not be included in the sponsoring depository institution’s FR 2900 report ([www.federalreserve.gov/boarddocs/legalint/FederalReserveAct/2004/20040126/](http://www.federalreserve.gov/boarddocs/legalint/FederalReserveAct/2004/20040126/)).

On the Call Report, the sponsoring depository institution reports the ASC Topic 810 (formerly FIN 46)-related liabilities in “other borrowed money” (Schedule RC, line 16). On the FR 2900 report, if the liabilities do not fall within the scope of the staff opinion, they are reported as deposits (that is, in this case the liabilities are considered primary obligations and must be reported as demand deposits (A.1.c) or time deposits (D.1, F.1, and BB.1), depending on their original maturity). Therefore, for those institutions with ASC Topic 810 (formerly FIN 46)-related liabilities, differences may arise between deposit items reported on the Call Report and the FR 2900 report.

For more information on primary obligations and a complete listing of exempt and nonexempt entities, see the FR 2900 instructions “Glossary of Terms,” and General Instructions, “Deposits as Defined Under Regulation D.”

### Interpretive Differences

Some items may be classified on the Call Report as either deposits or accounts payable and other liabilities. On the FR 2900, these items are generally reported as deposits. When reported as accounts payable and other liabilities on the Call Report, these items are omitted from the Call Report items used in interseries edit comparisons, making FR 2900 balances higher than Call Report balances when these items are present.

Examples of items that may be classified in this manner are: undistributed payments, advance payments of taxes and insurance, undistributed payroll deductions (withheld payroll taxes), and funds received in the course of servicing loans for others.

### Fair Value

Deposit liabilities reported on the FR 2900 must be based on the reporting institution's contractual liability to its counterparty, which includes any accrued interest. Institutions may elect to report their deposit liabilities at fair value on the Call Report. The balance reported at fair value on the Call Report may be greater than or less than the original value of the contractual liability reported on the FR 2900.

## Specific Legitimate Differences

The most common explanations given for valid legitimate differences are discussed below.

### 1. Total Demand Deposits

FR 2900		FFIEC 031, 041, and 051	
Line	Description	Code	Description
A.1.a + A.1.b + A.1.c	Total demand deposits: Demand deposits due to DIs + Demand deposits of US Government + Other demand deposits	RCN2210	RC-E, column B, line 7 (Total demand deposits)

#### *Legitimate Differences:*

Dealer Reserves: FR 2900 balance may be less than Call Report balance as a result of dealer reserves that arise in connection with bank financing of installment notes receivable. The account reflects the difference between the full face amount of installment notes acquired by the bank and the amount actually credited by the bank to the dealer. This difference is not reported on the FR 2900, while it is reported on the Call Report. (By definition, the dealer generally does not have access to the account; therefore, amounts are not reported on the FR 2900 until the reporting institution becomes liable to the dealer.)

Correspondent Pass-through Reserve Balances: FR 2900 balance may be less than Call Report balance. If the reporting bank serves as a reserve pass-through correspondent for other institutions, the amounts it receives and passes through to the Federal Reserve are reported differently on the FR 2900 and the Call Report. The FR 2900 excludes balances that have been received and are being passed through to the Federal Reserve to satisfy reserve requirements. The Call Report requires that the correspondent show both a “due to” depository institutions (included on Schedule RC-E, line 7) and a “due from” the Federal Reserve (Schedule RC-A, line 4), i.e., the deposits are reported on a gross basis. (Note: Technically, the “due to” balance on the Call Report could exceed the “due from” balance by the amount received by the correspondent but not yet passed through to the Federal Reserve.)

Primary Obligations: FR 2900 balance may be greater than Call Report balance because primary obligations with original maturities of less than seven days must be included in the FR 2900 item, while the Call Report item *does not* include primary obligations. Some ASC Topic 810 (formerly FIN 46)-related liabilities are considered primary obligations and are therefore reported on the FR 2900 (see “ASC Topic 810 (formerly FIN 46)” under “Primary Obligations” in the “General Legitimate Differences” section).

Reciprocal Balances: FR 2900 reciprocal balances are reported *gross* for certain counterparties, while Call Report reciprocal balances may be reported *net* regardless of counterparty.

Reciprocal balances arise when a reporting institution has both a deposit due to and a balance due from the same depository institution. The FR 2900 reporting rules allow due to balances (except for due bills) to be reported *net* of due from balances, if the counterparty is a U.S. office of one of the following:

- U.S. commercial bank
- trust company conducting a commercial banking business
- industrial bank
- banker’s bank that is organized as a commercial bank

- branch or agency of a foreign bank
- banking Edge or agreement corporation.

Otherwise, due to balances must be reported on a *gross* basis. For an example, see FR 2900 instructions for item A.1.a, “Demand deposits due to depository institutions.” On the Call Report, due to balances may be reported on a *net* basis, regardless of the counterparty, when a right of setoff exists (see Call Report glossary definition of “offsetting”).

Teller’s Checks: FR 2900 balance may be greater than Call Report balance because teller’s checks are reported on the FR 2900 (in line A.1.c, “Other demand deposits”) for *more days* than on the Call Report. On the FR 2900, the issuing bank reports the teller’s check in transaction accounts from the time of issuance until the teller’s check is paid. On the Call Report, the teller’s check itself is not reported but the funds received in connection with the sale of the teller’s check are reported as a deposit until remitted to the teller’s check service provider.

Example:      Day 1:    Bank issues \$1,000 teller’s check.  
                     Day 2:    Bank remits \$1,000 to teller’s check service provider.  
                     Day 6:    Service provider notifies bank that check has been paid.

Bank’s reporting of this transaction:

Day 1:    FR 2900 (item A.1.c) and Call Report show \$1,000 deposit.  
 Day 2:    Deposit is removed from Call Report.  
 Day 6:    Deposit is removed from FR 2900.

Result:    Legitimate difference occurs on days 2 through 6.

Edge and Agreement Corporations: FR 2900 balance may be greater than Call Report balance. The FR 2900 includes balances due to related Edge and agreement corporations (in line A.1.a, “Demand deposits due to depository institutions”) because Edge and agreement corporations file separate FR 2900 reports. On the Call Report, balances due to related Edge and agreement corporations are *consolidated* and therefore excluded from the reporting bank’s FFIEC 031 report.

Non-U.S. Affiliates: FR 2900 balance may be greater than Call Report balance. The FR 2900 includes deposits received from a *non-U.S.* office of an *affiliate* while these deposits are eliminated in the consolidation process on the domestic portion of the Call Report.

Non-U.S. Branches: FR 2900 balance may be greater than Call Report balance. The FR 2900 includes certain deposits at non-U.S. branches of the reporting institution, specifically:

- those payable at a U.S. office
- those for which the depositor is guaranteed payment at a U.S. office
- any deposit of a U.S. resident in a denomination of less than \$100,000, regardless of where payable.

These deposits are eliminated in the consolidation process from the domestic portion of the Call Report.

Commingled Trust Accounts: FR 2900 balance may be greater than Call Report balance. Depository institutions’ trust departments may place the idle cash balances of individual trusts that they manage in a single commingled transaction account at the depository institution. For FR 2900 reporting, overdrawn trust accounts are considered to have zero balances and are therefore not netted against positive trust balances for computing the balance in the commingled transaction account. On the Call Report, reporters may net negative balances in overdrawn trust accounts against positive balances in other trust accounts to

compute the net balance of the commingled transaction account.

## 2. ATS and NOW Accounts

FR 2900		FFIEC 031, 041, and 051	
Line	Description	Code	Description
A.2	ATS accounts and NOW accounts/share drafts, etc.	RCN2215 – RCN2210	RC-E, column A, line 7 (Total transaction accounts) – RC-E, column B, line 7 (Total demand deposits)

### *Legitimate Differences:*

There are no legitimate differences documented for this item.

## 3. Total Transaction Accounts

FR 2900		FFIEC 031, 041, and 051	
Line	Description	Code	Description
A.3	Total transaction accounts	RCN2215	RC-E, column A, line 7 (Total transaction accounts)

### *Legitimate Differences:*

Dealer Reserves: FR 2900 balance may be less than Call Report balance as a result of dealer reserves that arise in connection with bank financing of installment notes receivable. The account reflects the difference between the full face amount of installment notes acquired by the bank and the amount actually credited by the bank to the dealer. This difference is not reported on the FR 2900, while it is reported on the Call Report. (By definition, the dealer generally does not have access to the account; therefore, amounts are not reported on the FR 2900 until the reporting institution becomes liable to the dealer.)

Correspondent Pass-through Reserve Balances: FR 2900 balance may be less than Call Report balance. If the reporting bank serves as a reserve pass-through correspondent for other institutions, the amounts it receives and passes through to the Federal Reserve are reported differently on the FR 2900 and the Call Report. The FR 2900 excludes balances that have been received and are being passed through to the Federal Reserve to satisfy reserve requirements. The Call Report requires that the correspondent show both a “due to” depository institutions (included on Schedule RC-E, line 7) and a “due from” the Federal Reserve (Schedule RC-A, line 4), i.e., the deposits are reported on a gross basis. (Note: Technically, the “due to” balance on the Call Report could exceed the “due from” balance by the amount received by the correspondent but not yet passed through to the Federal Reserve.)

Primary Obligations: FR 2900 balance may be greater than Call Report balance because primary obligations with original maturities of less than seven days must be included in the FR 2900 item, while the Call Report items *do not* include primary obligations. Some ASC Topic 810 (formerly FIN 46)-related liabilities are considered primary obligations and are therefore reported on the FR 2900 (see “ASC Topic 810 (formerly FIN 46)” under “Primary Obligations” in the “General Legitimate Differences” section).

**Reciprocal Balances:** FR 2900 reciprocal balances are reported *gross* for certain counterparties, while Call Report reciprocal balances may be reported *net* regardless of counterparty. See explanation of “Reciprocal Balances” under “Total Demand Deposits” section.

**Teller’s Checks:** FR 2900 balance may be greater than Call Report balance because teller’s checks are reported on the FR 2900 (in line A.1.c, “Other demand deposits”) for *more days* than on the Call Report. On the FR 2900, the issuing bank reports the teller’s check in transaction accounts from the time of issuance until the teller’s check is paid. On the Call Report, the teller’s check itself is not reported but the funds received in connection with the sale of the teller’s check are reported as a deposit until remitted to the teller’s check service provider (see example under “Total Demand Deposits” section).

**Edge and Agreement Corporations:** FR 2900 balance may be greater than Call Report balance. The FR 2900 includes balances due to related Edge and agreement corporations in line A.1.a, “Demand deposits due to depository institutions” because Edge and agreement corporations file separate FR 2900 reports. On the Call Report, balances due to related Edge and agreement corporations are *consolidated* and therefore excluded from the reporting bank’s Call Report.

**Non-U.S. Affiliates:** FR 2900 balance may be greater than Call Report balance. The FR 2900 includes deposits received from a *non-U.S.* office of an *affiliate*, while these deposits are eliminated in the consolidation process on the domestic portion of the Call Report.

**Non-U.S. Branches:** FR 2900 balance may be greater than Call Report balance. The FR 2900 includes certain deposits at non-U.S. branches of the reporting institution. See explanation of “Non-U.S. Branches” under “Total Demand Deposits” section.

**Commingled Trust Accounts:** FR 2900 balance may be greater than Call Report balance. Depository institutions’ trust departments may place the idle cash balances of individual trusts that they manage in a single commingled transaction account at the depository institution. For FR 2900 reporting, overdrawn trust accounts are considered to have zero balances and are therefore not netted against positive trust balances for computing the balance in the commingled transaction account. On the Call Report, reporters may net negative balances in overdrawn trust accounts against positive balances in other trust accounts to compute the net balance of the commingled transaction account.

#### 4. Demand Balances Due From DIs + Cash Items in Process of Collection (CIPC) + Vault Cash

FR 2900		FFIEC 031, 041, and 051	
Line	Description	Code	Description
B.1 + B.2 + E.1	Demand balances due from DIs + Cash items in process of collection + Vault Cash	RCON0081	RC, line 1.a (Noninterest-bearing balances & currency and coin)

#### *Legitimate Differences:*

**Demand Balances:** FR 2900 balances may be less than Call Report balances because the Call Report item may include balances that do not meet the Regulation D definition of *demand* balances. FR 2900 line B.1 includes all balances due from depository institutions that are subject to *immediate* withdrawal by the reporting institution (i.e., no notice period prior to withdrawal is associated with these deposits, regardless of whether a notice period is ever actually exercised).

Interest-Bearing Demand Balances: FR 2900 balances may be greater than Call Report balances because the Call Report item excludes balances that bear interest whereas the FR 2900 item B.1 may include interest-bearing demand balances.

Federal Home Loan Bank Balances: FR 2900 balances may be less than Call Report balances because the Call Report includes balances due from Federal Home Loan Banks, whereas the FR 2900 does not.

Respondent Pass-through Reserve Balances: FR 2900 balance may be less than Call Report balance. The FR 2900 item B.1 excludes balances passed by a respondent through a correspondent to the Federal

Reserve to satisfy reserve requirements, while the Call Report item may include these balances if the interest earned on the balances is not paid to the respondent.

Depository Institutions Outside the U.S.: FR 2900 balance may be less than Call Report balance. FR 2900 line B.1 only includes those balances that are due from depository institutions *in the United States*. The Call Report item may include balances that are due from depository institutions *outside the United States*.

Definition of United States: FR 2900 balance may be less than Call Report balance. For both reports, cash items in the process of collection are defined to be checks in the process of collection drawn upon another depository institution payable immediately upon presentation in the United States. However, the Call Report includes Puerto Rico and the U.S. territories and possessions in its definition of United States, while the FR 2900 does not.

Foreign Currency: FR 2900 balance will be less than Call Report balance by the amount of foreign currency held as vault cash. FR 2900 item excludes foreign currency in the vault of the reporting institution, while the Call Report item includes it.

Reciprocal Balances: FR 2900 reciprocal balances are reported *gross* for certain counterparties, while Call Report reciprocal balances may be reported *net* regardless of counterparty. See explanation of “Reciprocal Balances” under “Total Demand Deposits” section.

Edge and Agreement Corporations: FR 2900 balance may be greater than Call Report balance. The FR 2900 includes balances due from related Edge and agreement corporations because Edge and agreement corporations file separate FR 2900 reports. On the Call Report, balances due to related Edge and agreement corporations are *consolidated* and therefore excluded from the reporting bank’s FFIEC 031 report.

Respondent Pass-through Excess Balances: FR 2900 balance may be greater than Call Report balance. The FR 2900 item B.1 includes balances passed by a respondent through a correspondent to the Federal Reserve in excess of reserve requirements, while the Call Report item may exclude these balances if the interest earned on the balances is paid to the respondent.

## 5. Cash Items in Process of Collection (CIPC)

FR 2900		FFIEC 031, 041, and 051	
Line	Description	Code	Description
B.2	Cash items in process of collection	RCON0020	RC-A, line 1.a (CIPC)



*Legitimate Difference:*

Definition of United States: FR 2900 balance may be less than Call Report balance. For both reports, cash items in the process of collection are defined to be checks in the process of collection drawn upon another depository institution payable immediately upon presentation in the United States. However, the Call Report includes Puerto Rico and the U.S. territories and possessions in its definition of United States, while the FR 2900 does not.

6. Total Savings Deposits

FR 2900		FFIEC 031, 041, and 051	
Line	Description	Code	Description
C.1	Total savings deposits	RCON6810 + RCON0352	RC-E, memo 2.a.(1) (MMDAs) + RC-E, memo 2.a.(2) (Other savings deposits)

*Legitimate Differences:*

Primary Obligations: FR 2900 balance may be greater than Call Report balance because primary obligations in the form of savings deposits must be included in the FR 2900 item, while the Call Report items *do not* include primary obligations.

Edge and Agreement Corporations: FR 2900 balance may be greater than Call Report balance. The FR 2900 includes balances due to related Edge and agreement corporations because Edge and agreement corporations file separate FR 2900 reports. On the Call Report, balances due to related Edge and agreement corporations are *consolidated* and therefore excluded from the reporting bank's Call Report.

Non-U.S. Affiliates: FR 2900 balance may be greater than Call Report balance. The FR 2900 includes deposits received from a *non-U.S.* office of an *affiliate*, while these deposits are eliminated in the consolidation process on the domestic portion of the Call Report.

Non-U.S. Branches: FR 2900 balance may be greater than Call Report balance. The FR 2900 includes certain deposits at non-U.S. branches of the reporting institution. See explanation of "Non-U.S. Branches" under "Total Demand Deposits" section.

7. Vault Cash

FR 2900		FFIEC 031, 041, and 051	
Line	Description	Code	Description
E.1	Vault Cash	RCON0080	RC-A, line 1.b (Currency and coin)

*Legitimate Difference:*

Foreign Currency: FR 2900 balance will be less than Call Report balance by the amount of foreign currency held as vault cash. The FR 2900 item excludes foreign currency in the vault of the reporting institution, while the Call Report item includes it.

## 8. Large Time Deposits

FR 2900		FFIEC 031, 041, and 051	
Line	Description	Code	Description
F.1	Large time deposits	RCONJ473 RCONJ473 + RCONJ474	RC-E, memo 2.c (Time deposits of \$100,000 through \$250,000) + RC-E, memo 2.d (Time deposits of more than \$250,000)

### *Legitimate Differences:*

**Primary Obligations:** FR 2900 balance may be greater than Call Report balance because primary obligations with original maturities of seven days or more must be included in the FR 2900 item, while the Call Report item *does not* include primary obligations. Some ASC Topic 810 (formerly FIN 46)-related liabilities are considered primary obligations and are therefore reported on the FR 2900 (see “ASC Topic 810 (formerly FIN 46)” under “Primary Obligations” in the “General Legitimate Differences” section).

**Edge and Agreement Corporations:** FR 2900 balance may be greater than Call Report balance. The FR 2900 item includes balances due to related Edge and agreement corporations because Edge and agreement corporations file separate FR 2900 reports. On the Call Report, balances due to related Edge and agreement corporations are *consolidated* and therefore excluded from the reporting bank’s Call Report.

**Non-U.S. Affiliates:** FR 2900 balance may be greater than Call Report balance. The FR 2900 item includes deposits received from a *non-U.S.* office of an *affiliate*, while these deposits are eliminated in the consolidation process on the domestic portion of the Call Report.

**Non-U.S. Branches:** FR 2900 balance may be greater than Call Report balance. The FR 2900 includes certain deposits at non-U.S. branches of the reporting institution. See explanation of “Non-U.S. Branches” under “Total Demand Deposits” section.

## 9. Small Time Deposits

FR 2900		FFIEC 031, 041, and 051	
Line	Description	Code	Description
D.1 – F.1	Small time deposits: Total time deposits – Large time deposits	RCON6648	RC-E, memo 2.b (Time deposits less than \$100,000)

### *Legitimate Differences:*

**Primary Obligations:** FR 2900 balance may be greater than Call Report balance because primary obligations with original maturities of seven days or more must be included in the FR 2900 item, while the Call Report item *does not* include primary obligations. Some ASC Topic 810 (formerly FIN 46)-related liabilities are considered primary obligations and are therefore reported on the FR 2900 (see “ASC

Topic 810 (formerly FIN 46)” under “Primary Obligations” in the “General Legitimate Differences” section).

Edge and Agreement Corporations: FR 2900 balance may be greater than Call Report balance. The FR 2900 item includes balances due to related Edge and agreement corporations because Edge and agreement corporations file separate FR 2900 reports. On the Call Report, balances due to related Edge and agreement corporations are *consolidated* and therefore excluded from the reporting bank’s Call Report.

Non-U.S. Affiliates: FR 2900 balance may be greater than Call Report balance. The FR 2900 item includes deposits received from a *non-U.S.* office of an *affiliate*, while these deposits are eliminated in the consolidation process on the domestic portion of the Call Report.

Non-U.S. Branches: FR 2900 balance may be greater than Call Report balance. The FR 2900 includes certain deposits at non-U.S. branches of the reporting institution. See explanation of “Non-U.S. Branches” under “Total Demand Deposits” section.

#### 10. Total Deposits

FR 2900		FFIEC 031, 041, and 051	
Line	Description	Code	Description
A.3 + C.1 + D.1	Total deposits: Total transaction accounts + Total savings deposits + Total time deposits	RCON2215 + RCON2385	+ RC-E, column A, line 7 (Total transaction accounts) + RC-E, column C, line 7 (Total nontransaction accounts)

#### *Legitimate Differences:*

Dealer Reserves: FR 2900 balance may be less than Call Report balance as a result of dealer reserves that arise in connection with bank financing of installment notes receivable. The account reflects the difference between the full face amount of installment notes acquired by the bank and the amount actually credited by the bank to the dealer. This difference is not reported on the FR 2900, while it is reported on the Call Report. (By definition, the dealer generally does not have access to the account; therefore, amounts are not reported on the FR 2900 until the reporting institution becomes liable to the dealer.)

Correspondent Pass-through Reserve Balances: FR 2900 balance may be less than Call Report balance. If the reporting bank serves as a reserve pass-through correspondent for other institutions, the amounts it receives and passes through to the Federal Reserve are reported differently on the FR 2900 and the Call Report. The FR 2900 item excludes balances that have been received and are being passed through to the Federal Reserve to satisfy reserve requirements. The Call Report requires that the correspondent show both a “due to” depository institutions (included on Schedule RC-E, line 7) and a “due from” the Federal Reserve (Schedule RC-A, line 4), i.e., the deposits are reported on a gross basis. (Note: Technically, the “due to” balance on the Call Report could exceed the “due from” balance by the amount received by the correspondent but not yet passed through to the Federal Reserve.)

Primary Obligations: FR 2900 balance may be greater than Call Report balance because primary obligations must be included in the FR 2900 items, while the Call Report items *do not* include primary

obligations. Some ASC Topic 810 (formerly FIN 46)-related liabilities are considered primary obligations and are therefore reported on the FR 2900 (see “ASC Topic 810 (formerly FIN 46)” under “Primary Obligations” in the “General Legitimate Differences” section).

Reciprocal Balances: FR 2900 reciprocal balances are reported *gross* for certain counterparties, while Call Report reciprocal balances may be reported *net* regardless of counterparty. See explanation of “Reciprocal Balances” under “Total Demand Deposits” section.

Teller’s Checks: FR 2900 balance may be greater than Call Report balance because teller’s checks are reported on the FR 2900 (in line A.1.c, “Other demand deposits”) for *more days* than on the Call Report. On the FR 2900, the issuing bank reports the teller’s check in transaction accounts from the time of issuance until the teller’s check is paid. On the Call Report, the teller’s check itself is not reported but the funds received in connection with the sale of the teller’s check are reported as a deposit until remitted to the teller’s check service provider (see example under “Total Demand Deposits” section.)

Edge and Agreement Corporations: FR 2900 balance may be greater than Call Report balance. The FR 2900 item includes balances due to related Edge and agreement corporations because Edge and agreement corporations file separate FR 2900 reports. On the Call Report, balances due to related Edge and agreement corporations are *consolidated* and therefore excluded from the reporting bank’s Call Report.

Non-U.S. Affiliates: FR 2900 balance may be greater than Call Report balance. The FR 2900 item includes deposits received from a *non-U.S.* office of an *affiliate*, while these deposits are eliminated in the consolidation process on the domestic portion of the Call Report.

Non-U.S. Branches: FR 2900 balance may be greater than Call Report balance. The FR 2900 includes certain deposits at non-U.S. branches of the reporting institution. See explanation of “Non-U.S. Branches” under “Total Demand Deposits” section.

Commingled Trust Accounts: FR 2900 balance may be greater than Call Report balance. Depository institutions’ trust departments may place the idle cash balances of individual trusts that they manage in a single commingled transaction account at the depository institution. For FR 2900 reporting, overdrawn trust accounts are considered to have zero balances and are therefore not netted against positive trust balances for computing the balance in the commingled transaction account. On the Call Report, reporters may net negative balances in overdrawn trust accounts against positive balances in other trust accounts to compute the net balance of the commingled transaction account.