

**Supporting Statement for
OMB Control Number 1557-0081
(MA)-Reports of Condition and Income (Interagency Call Report)**

A. Justification

1. Circumstances that make the collection necessary:

Reports of Condition are required under 12 U.S.C. 161. The OCC needs this information to ensure individual bank and banking system safety and soundness.

This submission covers the revisions to the Call Report to be implemented during 2009.

The revisions include:

- Reporting of loans and leases held for investment acquired in a business combination
- All fiduciary and related services income will become publicly available
- Further clarification on the definition of loans secured by real estate
- Reporting of the bank's fiscal year-end date
- New line item for the balance sheet for "Direct and indirect investments in real estate ventures
- Separate reporting of commercial mortgage-backed securities
- Separate reporting of structured financial products by cash, synthetic, or hybrid instruments
- New reporting on the types of underlying collateral on structured finance products
- New reporting for interest reserves on real estate construction loans
- Separate reporting of commercial mortgage-backed securities and structured financial products by type of instrument and underlying collateral
- New reporting on pledged trading assets
- New reporting to capture amortized cost and fair value of held-to-maturity and available-for-sale securities in domestic offices.
- New reporting for credit derivatives by capital treatment
- New reporting for credit derivatives by remaining maturity
- New reporting for over-the-counter derivatives by type of counterparty and type of collateral
- Added a new line item to the balance sheet for "Direct and indirect investments in real estate ventures and deleted to related items in the Memoranda Schedule
- Added two questions on "Does the bank act as trustee or custodian for individual Retirement Accounts, etc." and "Does the bank provide custody, safekeeping, or other services involving the acceptance of orders for the sale or purchase of securities"
- New maturity breakdown for "Unsecured "Other borrowings" and "Subordinated notes and debentures"
- Further breakdown for reporting of assets and liabilities measured at fair value
- New items for regulatory capital purposes for the treatment of liquidity facilities for asset-backed commercial paper programs and credit derivative exposure for determining the

current credit exposure across all derivative contracts covered by the risk-based capital standards.

- Nine new items were added to the various sections of the Trust Schedule

The revisions to the Call Report will be implemented in the March, June and December reporting periods. The changes were spread out during the year in order to provide sufficient time for the reporting institutions to plan and program their information systems for reporting the Call Report changes. The changes for March are listed in the first four changes listed above. The remaining items listed above will be implemented in the June Call Report except the last change listed, for changes to the Trust schedule, will be implemented in the December Call Report. Two proposed changes are not listed above for implementation at this time because of public comments received. Changes to trading assets that are past due or in nonaccrual status and further clarification of unused commitments will be tabled for further consideration and implementation at a later date.

For the March, June and December 2009, report dates, institutions may provide reasonable estimates for any new or revised Call Report item required to be reported as of that date for which the requested information is not readily available.

2. Use of the information:

Data from Call Reports are shared among the agencies and placed in each agency's computerized databases for supervisory and industry monitoring purposes. Also, Call Report data are used by the FDIC in preparing the comprehensive interagency Uniform Bank Performance Reports (UBPRs). UBPRs are produced quarterly for each insured commercial bank.

The banking agencies use the information, as an aid, to determine the safety and soundness of individual financial institutions and to identify trends in the banking system. The data are input into a data base and analyzed both by the computer and by examiners. The data are used for peer analysis of banks, to determine strengths and weaknesses in a particular institution as compared to similar institutions. The data also are used in scheduling bank examinations and in determining areas of focus for the examiners during their on-site visit.

The Call Report is the major source of financial information on individual banks and the industry and assists the OCC in discharging its responsibility to maintain a safe and sound banking system. In addition, Call Reports provide the most current statistical data available for evaluating bank applications for actions as mergers and establishing branches, for numerous economic studies and analyses in regards to banking, reports submitted to Congress, and for public data use.

Call Report data are also used by bank management to evaluate their institutions, by bank analysts and investors, and by the public in determining the desirability of investing or making deposits in a particular bank.

3. Consideration of the use of improved information technology:

All banks are required to submit their Call Reports electronically through the banking agencies “Central Data Repository”, using the Internet. Currently, a bank must file its Call Report in one of two ways:

- A bank may use computer software to prepare and edit its report data and then electronically submit the data directly to the CDR (<http://cdr.ffiec.gov/cdr/>)
- A bank may complete its report in paper form and arrange with a software vendor or another party to convert its paper report into the electronic format that can be processed by the CDR. The software vendor or other party then must electronically submit the bank’s Call Report data file to the CDR.

Regardless of the method a bank uses to file its Call Report, the bank remains responsible for the accuracy of its Call Report data. The information collections under this process facilitates more accurate bank Call Report data submission.

Since June 1998, quarterly Call Report submissions have been made available to the public on the Internet. Call Report formats and instructions have been made available to the banks and others on the Internet.

The banking agencies implemented a new Central Data Repository for the collection and processing of bank Call Reports effective with the September 30, 2005 Call period. One of the principle features of the new business model is the use of Extensible Business Reporting Language (XBRL). XBRL is a new XML-based specification that uses accepted financial reporting standards and practices to exchange financial statements across all software and technologies, including the Internet.

4. Efforts to identify duplication:

This information is unique because no other report or a series of reports provides all the Call Report data from all the national banks in a consistent and timely manner.

5. Methods used to minimize burden if the collection has a significant impact on substantial number of small entities:

Only the minimum information needed to evaluate the condition of a bank, regardless of size, is required.

6. Consequences to the Federal program if the collection were conducted less frequently:

Under 12 U.S.C. 161, quarterly reporting is required in some instances. Further, the Federal financial regulatory agencies must have condition and income data at least quarterly to

properly monitor individual bank and industry trends. Less frequent collection of this information would impair the agencies' monitoring and seriously delay regulatory response.

7. Special circumstances necessitating collection inconsistent with 5 CFR Part 1320:

This collection is conducted in accordance with the guidelines in 5 CFR Part 1320.

8. Efforts to consult with persons outside the agency:

On September 23, 2008, the OCC, FDIC, FRB, and the OTS published a joint notice soliciting comments for 60 days on proposed revisions to the Call Report (72 FR 51814). The agencies collectively received comments from six respondents. A detailed discussion of these comments and the agencies' response to the comments is included in the 30-day Federal Register notice.

9. Payment to respondents:

None.

10. Any assurance of confidentiality:

The data collected from individual banks in the Call Report are publicly available with the exception of certain sensitive information. The agencies currently give confidential treatment to data collected in Schedule RC-T, "Fiduciary and Related Services," on fiduciary and related services income (items 12 through 23) and fiduciary settlements, surcharges, and losses (Memorandum item 4). Contact information on bank personnel that is provided in each bank's Call Report submission is also provided confidential treatment. All non-confidential Call Report data on individual banks is available on request from the Federal Financial Institutions Examinations Council (FFIEC) and on the FFIEC Internet Web-site.

11. Justification for questions of a sensitive nature:

None.

12. Burden estimate:

The OCC estimates that 1,620 national banks will file Call Reports each quarter and that the burden will average 187 burden hours per year. An individual bank's actual burden may be higher or lower, depending on the complexity of the bank's structure and the degree of accounting system automation.

The OCC estimates total burden as follows:

1,620 respondents @ 4 responses = 6,480 annual responses
6,480 responses @ 46.76 hours = 303,027 burden hours

13. Estimate of annualized costs to respondents:

Not applicable.

14. Estimate of annualized costs to the government:

Not applicable.

15. Changes in burden:

Former burden: 1,620 respondents @ 4 responses = 6,480 annual responses
6,480 responses @ 45.92 hours = 297,589 burden hours

New burden: 1,620 respondents @ 4 responses = 6,480 annual responses
6,480 responses @ 46.76 hours = 303,027 burden hours

Change: + 0.84 hours per response; + 5,438 burden hours

The OCC estimates the cost of the hour burden to respondents as follows:

Clerical:	20% x 303,027 =	60,605.40 @ \$20 =	\$ 1,212,108.00
Managerial/technical:	65% x 303,027 =	196,967.55 @ \$40 =	\$ 7,878,702.00
Senior mgmt/professional:	14% x 303,027 =	42,423.78 @ \$80 =	\$ 3,393,902.40
Legal:	01% x 303,027 =	3,030.27 @ \$100 =	\$ 303,027.00
Total:			\$12,787,739.40

16. Information regarding collections whose results are planned to be published for statistical use:

Not applicable.

17. Approval to not display OMB expiration date.

Not applicable.

18. Exceptions to certification statement.

None.

B. Collections of Information Employing Statistical Methods.

Not applicable.