SUPPORTING STATEMENT

Consolidated Reports of Condition and Income
FFIEC 031 and 041
(OMB No. 3064-0052)

INTRODUCTION

The Federal Deposit Insurance Corporation (FDIC) is submitting for Office of Management and Budget (OMB) review a change to the Federal Financial Institutions Examination Council (FFIEC) Consolidated Reports of Condition and Income (Call Report) filed quarterly by FDIC-supervised banks and savings associations. The Federal Reserve Board (FRB) and the Office of the Comptroller of the Currency (OCC) are also submitting this change for OMB review for the banks and savings associations under their supervision.

The proposed revision to the Call Reports that is the subject of this request has been approved by the FFIEC. A new Schedule RI-C, Disaggregated Data on the Allowance for Loan and Lease Losses (ALLL), would be added to the Call Report as of the March 31, 2013, report date and would be completed by institutions with $1 billion or more in total assets. This proposed new schedule would enable the agencies to more finely focus their analyses related to the composition of these institutions' ALLLs and the changes therein over time, thereby aiding in evaluations of the appropriateness of the reported level of their ALLLs. The reported data also would provide a better understanding of how institutions' ALLL practices and allocations differ for particular loan categories as economic conditions change

Consistent with longstanding practice, for the March 31, 2013, report date, institutions required to complete Schedule RI-C may provide reasonable estimates for any item in the schedule for which the requested information is not readily available.

JUSTIFICATION

1. Circumstances and Need

Section 7 of the Federal Deposit Insurance Act requires all insured depository institutions to submit four "reports of condition" each year to their primary federal bank supervisory authority, i.e., the FDIC, the OCC, or the FRB, as appropriate. FDIC-supervised institutions, i.e., insured state nonmember banks and state savings associations, submit these reports to the FDIC. The FDIC uses the quarterly Call Reports to monitor the condition and performance of individual institutions and the industry as a whole. In addition, Call Reports provide the FDIC with the most current statistical data available for evaluating depository institution corporate applications such as mergers; identifying areas of focus for both on-site and off-site examinations; calculating all insured institutions' deposit insurance and Financing Corporation assessments; and other public purposes.

Within the Call Report information collection system, separate sets of forms apply to institutions that have domestic and foreign offices (FFIEC 031) and to institutions with domestic offices only (FFIEC 041).

The amount of data required to be reported varies between the two versions of the report forms, with the report forms for institutions with domestic and foreign offices (FFIEC 031) having more data items than the report forms for institutions with domestic offices only (FFIEC 041). Furthermore, the amount of data required to be reported varies within the FFIEC 041 report form, primarily based on the size of the institution, but also in some cases based on activity levels. In general, the FFIEC 041 report form requires the least amount of data from institutions with less than $100 million in total assets.

The reasons for the change that is the subject of this submission are described in detail in the agencies' initial and final Paperwork Reduction Act (PRA) Federal Register notices published on November 21, 2011, and November 8, 2012, respectively.

2. <u>Use of Information Collected</u>

The information collected in the Call Reports is used by the FDIC and the other federal banking agencies both on an individual institution basis and in aggregate form for supervisory, surveillance, regulatory, research, statistical, insurance assessment, and informational purposes. Call Report data for all institutions, not just the institutions under an individual banking agency's primary supervision, are available to each of the three banking agencies in order for each agency to have access to information for the insured depository institution system as a whole.

The FDIC uses the data collected in the Call Reports extensively for supervisory and surveillance purposes in an effort to detect at an early date those institutions that are experiencing deterioration or some other significant change in their condition. The underlying basis for this activity at the FDIC, as well as at the OCC and the FRB, is the goal of maintaining a safe and sound banking system and reducing the possibility of the failure of individual institutions and the concomitant exposure of the Deposit Insurance Fund administered by the FDIC. The FDIC has two major surveillance programs (EWS and UBPR) for its use in performing off-site evaluation of the condition of banks and savings associations. In addition, various quarterly management and supervisory reports used for off-site monitoring capabilities are available in web-based systems like ViSION (Virtual Supervisory Information on the Net) and distributed systems like ARIS (Automated Regional Information System).

<u>Early Warning Systems (EWS)</u> – The EWS is the FDIC's umbrella of off-site surveillance models that are used to monitor the condition of insured institutions between regular on-site examinations. Data collected from each institution's Call Report are subjected to a screening process in the EWS known as SCOR (Statistical CAMELS Off-site Rating). SCOR is an off-site model for insured institutions that compares an institution's financial condition against examination ratings for comparable financial institutions. SCOR derives a rating for each component of the Uniform Financial Institutions Rating System (UFIRS). The composite and

component ratings are then compared to those given at the last examination and a downgrade probability is derived for each institution. Those institutions whose downgrade probability exceeds a specified level are subject to supervisory follow-up procedures including the prompt scheduling of examinations or visitations. The FDIC also has developed two off-site rating tools called GMS (Growth Monitoring System) and REST (Real Estate Stress Test) in order to effectively and efficiently monitor risk to the banking and thrift system. GMS identifies institutions that may pose greater risks due to rapid growth and/or funding issues. GMS places institutions into percentile rankings based on GMS scores. Those with the highest GMS scores are subject to formal off-site review requirements similar to SCOR. REST identifies institutions with high concentrations of commercial real estate and other exposures similar to the exposure characteristics of problem institutions and institutions that failed during the New England crisis of the late 1980s and early 1990s.

Another part of the EWS includes the Uniform Bank Performance System (UBPS). The UBPS is an on-line support subsystem that calculates for each institution approximately 300 financial ratios and accompanying peer group and ranking data and presents this information in a manner consistent with the Uniform Bank Performance Report, which is discussed below. The UBPS covers the most recent and preceding 15 quarters.

<u>Uniform Bank Performance Report (UBPR)</u> – This report is prepared quarterly for each insured institution from Call Report data and presents information for five periods on an institution's performance and financial statement composition in the form of ratios, percentages, and dollar amounts. Each UBPR also includes corresponding average data for the institution's peer group and percentile rankings for most ratios. The comparative and trend data contained in these reports complement the EMS data and are utilized for further off-premises review of individual institutions, particularly at the field office level. Based on an analysis of the information in the UBPR, an examiner can set the priorities for the examination of an individual institution. An institution's condition can then be evaluated during the examination in light of its recent trends and the examiner's findings can be communicated to the institution's management. Management can verify this trend data for itself in the institution's own UBPRs. UBPRs are available on-line on the Internet for access by institutions, regulators, and the public.

<u>ViSION and ARIS</u> – ViSION is a secure web-enabled system that was developed as a comprehensive and easy-to-use reporting source for the FDIC's supervisory and financial data. The system provides FDIC users with multiple reports that display information for a specific institution or set of institutions. ViSION provides users the ability to retrieve various supervisory and off-site reports. These various management reports are used to assist in off-site monitoring efforts and are reviewed at the regional or field office level on a regular basis. ARIS is a localized database and reporting system that includes many levels of drill-down management and supervisory reporting.

Through the use of monitoring and surveillance systems that rely on Call Report information, the FDIC is able to more effectively and efficiently allocate resources to those institutions experiencing difficulties. Also, FDIC policy requires examiners to use information from Call Reports as well as data available from monitoring and surveillance systems to assist in their pre-examination planning activities. Through pre-examination planning, examiners can determine the areas of an institution's operations and activities on which to focus their attention during their time on-site at the institution. Moreover, effective pre-examination planning can help to limit the amount of time examiners need to spend on-site during an examination. These efforts would not be feasible if Call Reports, with their emphasis on the collection of data for supervisory and surveillance purposes, were not available on a quarterly basis.

Call Reports also provide the most current statistical data available for evaluating statutory factors relating to the FDIC's consideration of institutions' applications for deposit insurance and for consent to merge, establish a branch, relocate an office, and retire capital. The amount of each individual institution's deposit insurance and Financing Corporation assessments is calculated directly by the FDIC from the data reported on the institution's Call Report. In addition, under the FDIC's risk-related insurance assessment system, Call Report data are used to help determine the risk category to which each insured institution should be assigned. The FDIC's Division of Insurance and Research uses data collected in the Call Reports to prepare quarterly reports on the condition and performance of the banking system and for numerous economic studies and analyses of trends in banking that are incorporated into reports submitted to Congress and made available to the public.

3. Use of Technology to Reduce Burden

All banks are subject to an electronic filing requirement for Call Reports. In this regard, the agencies have created a secure shared database for collecting, managing, validating and distributing Call Report data. This database system, the Central Data Repository (CDR), was implemented for the third quarter 2005 Call Report filing period and is the only method now available for banks to submit their Call Reports. Under the CDR system, banks file their Call Report data via the Internet using software that contains the FFIEC's edits for validating Call Report data before submission.

4. Efforts to Identify Duplication

There is no other report or series of reports that collects from all insured banks and savings associations the information gathered through the Consolidated Reports of Condition and Income taken as a whole. There are other information collection systems which tend to duplicate certain parts of the Call Report; however, the information they provide would be of limited value as a replacement for the Call Report.

For example, the FRB collects various reports in connection with its measurement of monetary aggregates, bank credit, and the flow of funds. Reporting institutions supply the FRB with detailed information relating to such balance sheet accounts as balances due from depository institutions, loans, and deposit liabilities. The FRB also collects financial data from bank holding companies on a regular basis. Such data is presented for the holding company on a parent company only basis and, if certain conditions are met, on a consolidated basis, including the holding company's banking and nonbanking subsidiaries.

However, FRB reports from insured institutions are frequently obtained on a sample basis rather than from all insured institutions. Moreover, these reports are often prepared as of dates other than the last business day of each quarter, which would seriously limit their comparability to the Call Report. Institutions below a certain size are exempt entirely from some FRB reporting requirements. FRB data collected from bank holding companies on a consolidated basis reflect an aggregate amount for all subsidiaries within the organization, both banking and nonbanking, so that the actual dollar amounts applicable to any depository institution subsidiary are not determinable from the holding company reports. Hence, FRB reports could not be a viable replacement for even a significant portion of the Call Reports since the FDIC, in its role as supervisor of insured state nonmember banks and state savings associations, would be lacking the data necessary to assess the financial condition of individual insured institutions to determine whether there had been any deterioration in their condition.

As another example, insured institutions with either 500 or more, or 2,000 or more, shareholders (depending on charter type) or with a class of equity securities listed on a securities exchange are required by the Securities Exchange Act of 1934, as recently amended by the Jumpstart Our Business Startups Act, to register their stock with their primary federal banking agency. Following the effective date of the stock registration, quarterly and annual reports, which contain financial statements, must be filed with the appropriate banking agency. Of the more than 4,500 FDIC-supervised banks and savings associations, less than 25 have stock that is registered with the FDIC pursuant to the Securities Exchange Act. For this small number of registered institutions, quarterly and annual reports generally need not be filed until as many as 45 days and 90 days after the report date, respectively, while Call Reports generally must be received no later than 30 days after the report date. Moreover, the Call Reports have a fixed format to permit industry data aggregation by computer and automated monitoring of each individual institution’s performance and condition. The financial statement format for registered institutions is generally comparable to that of the Call Report, but each institution has the flexibility to expand or contract the level of detail on individual items as circumstances warrant. Such free-form reporting would make it extremely difficult for the FDIC to substitute these registered institutions’ quarterly and annual reports for Call Reports.

Finally, some of the information contained in the Call Report is also developed by FDIC examiners during regular safety and soundness examinations of insured institutions. In addition, examiners check the Consolidated Reports of Condition and Income that an institution has submitted to the FDIC between examinations to ensure that the required data have been properly reported. However, using the examination process to develop quarterly Call Report data would be unworkable since one of the principal purposes of the supervisory and surveillance emphasis on the use of these data is for off-site monitoring of the condition and performance of individual institutions between examinations. Furthermore, examinations are conducted as of various dates throughout the year and at differing time intervals for different institutions. Thus, the examination process could not supply the banking agencies with financial data on a timely basis for all insured institutions as of fixed dates each year.

5. Minimizing the Burden on Small Institutions

Pursuant to regulations issued by the Small Business Administration (13 CFR 121.201), a "small entity" includes depository institutions with assets of $175 million or less. There are more than 4,500 insured state nonmember banks and state savings associations that are supervised by the FDIC. Of this number, approximately 2,550 have total assets of $175 million or less. As stated in Item 1 of this supporting statement, the Call Report requires the least amount of data from institutions with less than $100 million in total assets. The next least amount of data is collected from institutions with $100 million to $300 million in total assets.

The proposed Call Report revision that is the subject of this submission applies to institutions with $1 billion or more in total assets. Thus, it will have no impact on small institutions.

6. Consequences of Less Frequent Collection

Less frequent collection of Call Reports would reduce the FDIC's ability to identify on a timely basis those institutions that are experiencing adverse changes in their condition so that appropriate corrective measures can be implemented to restore their safety and soundness. Such identification cannot be accomplished through periodic on-site examinations alone. To allocate its examination resources in the most efficient manner, off-site analysis of Call Report data to single out institutions in need of accelerated on-site follow-up must be performed (see Section 2 above). Submission of the Consolidated Reports of Condition and Income less frequently than quarterly would permit deteriorating conditions at institutions to fester considerably longer before they would be detected through the FDIC's computer-based monitoring systems, through the fortunate scheduling of an examination, or by other means. Such institutions would therefore run a greater risk of failure because of delays in effecting corrective action, either on institution management's own initiative or at the behest of the FDIC.

7. Special Circumstances

There are no special circumstances.

8. Summary of Public Comments

On November 21, 2011, the agencies published an initial PRA Federal Register notice requesting comment on a limited number of proposed revisions to the Call Report for implementation in March and June 2012.[1] After considering the comments received, on February 17, 2012, the agencies announced in the Federal Register the implementation of reporting changes and instructional revisions that had been proposed to take effect March 31, 2012.[2] The agencies also announced the implementation of revisions to two existing schedules proposed for implementation as of June 30, 2012. These Call Report revisions were approved by OMB on March 30, 2012.

1 76 FR 72035.

2 77 FR 9727.

In their February 17, 2012, Federal Register notice, the agencies further stated they were deferring the implementation of proposed new Schedule RC-U, Loan Origination Activity (in Domestic Offices), and proposed new Schedule RI-C, Disaggregated Data on the Allowance for Loan and Lease Losses (ALLL), both of which were originally proposed to be added to the Call Report effective June 30, 2012. The FFIEC and the agencies announced they were continuing to evaluate these proposed new schedules in light of the comments received.

The agencies collectively received comments from eight entities on their November 21, 2011, Federal Register notice initially proposing these revisions: four banking organizations, two bankers' associations, a commercial lending software company, and a news organization. Three banking organizations and the two bankers' associations addressed proposed Schedule RI-C, and all eight commenters addressed proposed Schedule RC-U. The FFIEC and the agencies have now completed their evaluation of the comments received on proposed Schedule RI-C and, as discussed below, have modified the schedule in response to comments. The FFIEC and the agencies are continuing to consider whether and how to proceed with proposed Schedule RC-U in light of the comments received. Their decision with respect to Schedule RC-U will be addressed in a future Federal Register notice and, if applicable, submissions by the agencies will be made to OMB.

With respect to proposed Schedule RI-C, commenters expressed the general concern that the schedule's proposed disaggregated ALLL data are not aligned with the manner in which institutions estimate and maintain their ALLL. According to the commenters, modifying systems to report ALLL information categorized as originally proposed by the agencies would be costly and necessitate significant lead time to implement. One commenter also recommended increasing the asset size threshold for institutions to report this schedule from the proposed $1 billion or more in total assets to $5 billion or $10 billion or more in total assets.

Two commenters recommended a more streamlined approach requiring disclosure of fewer loan categories than had been proposed by the agencies, thereby allowing the agencies to achieve their stated objective and permit institutions to report data consistently with their business models and methodologies used to estimate their ALLL. Another commenter stated that it fully supported the recommendations made by one of these two commenters. Implicit in both of these recommendations for reporting ALLL data for fewer loan categories than had been proposed is the concept that the definitions for the loan categories in Schedule RI-C should be those the reporting institution uses in its ALLL methodology rather than those specified in Call Report Schedule RC-C, part I, Loans and Leases.

After considering the comments received on proposed Schedule RI-C, the FFIEC and the agencies decided to modify the schedule to collect ALLL and the related recorded investment amounts by impairment measurement method based on the limited number of general loan categories recommended by one of the commenters, but with the addition of a loan category for real estate construction loans. The agencies consider it appropriate to segregate construction loans from other commercial real estate loans because the risk characteristics of the former differ significantly from those of the latter. The agencies believe the streamlined Schedule RI-C approach they have adopted in response to comments will be more consistent with the ALLL methodologies institutions currently employ and also use to meet the disclosure requirements required under U.S. generally accepted accounting principles (GAAP). At the same time, the data that would be reported in Schedule RI-C, as modified, should be sufficient to enable the agencies to more finely focus their analyses related to the composition of an institution's ALLL and the changes therein over time.

The FFIEC and the agencies decided to retain the proposed $1 billion total asset threshold for Schedule RI-C, which exempts 91 percent of all institutions from this reporting requirement. Nevertheless, given that institutions with $1 billion or more in total assets coincidentally hold nearly 91 percent of the ALLL balances held by all institutions as of June 30, 2012, retaining the $1 billion reporting threshold as proposed will enable the agencies to perform a more comprehensive and decision-useful analysis of loan loss allowances for the depository institution system. Furthermore, all institutions with $1 billion or more in total assets are subject to regulations requiring them to prepare annual financial statements in accordance with GAAP.[3] Accordingly, such institutions should have processes in place to develop the disaggregated ALLL data required to be disclosed under GAAP, which are comparable to the data specified by Schedule RI-C as modified in response to comments.

9. Payment or Gift to Respondents

No payment or gift will be provided to respondents.

10. Confidentiality

At present, all data items collected from individual institutions in the Call Report are publicly available with the exception of the amounts institutions report in Schedule RI-E, item 2.g, "FDIC deposit insurance assessments"; Schedule RC-F, item 6.f, "Prepaid deposit insurance assessments;" and Schedule RC-P, items 7.a and 7.b, for representation and warranty reserves for 1-4 family residential mortgages sold made to specified parties; and the information that large and highly complex institutions report on criticized and classified items, nontraditional mortgage loans, subprime consumer loans, leveraged loans, top 20 counterparty exposures, and largest counterparty exposure for assessment purposes in Schedule RC-O, items 6 through 9, 14, and 15, which are used as inputs to scorecard measures in the FDIC's deposit insurance assessment system for large institutions and highly complex institutions. In addition, contact information for depository institution personnel that is provided in institutions' Call Report submissions is not available to the public.

[3] 12 CFR Part 363, Annual Independent Audits and Reporting Requirements.

11. Information of a Sensitive Nature

The Call Report contains no questions of a sensitive nature.

12. Estimate of Annual Burden

It is estimated that, on average, it will take an FDIC-supervised institution approximately 40.56 hours each quarter to prepare and file its Call Report on an ongoing basis. This estimate reflects the average ongoing reporting burden for all FDIC-supervision institutions after those institutions with $1 billion or more in total assets complete any necessary recordkeeping and systems changes to enable them to complete proposed new Schedule RI-C, which is the subject of this submission.

The estimated annual ongoing reporting burden for the 4,531 FDIC-supervised institutions to prepare and file the Call Report as it is proposed to be revised effective March 31, 2013, is 735,109 hours. The annual ongoing reporting burden has been estimated by considering the varying numbers of Call Report data items potentially reportable by institutions of different sizes and with foreign offices and the extent to which such institutions will actually have amounts to report in these data items as a result of the activities and transactions in which they are engaged. Then, based on the agency staff's understanding of institutions' recordkeeping and reporting systems and their customary and usual business practices, professional judgment has been applied to arrive at a burden estimate for the Call Report. The average ongoing reporting burden to prepare and file the Call Report is estimated to range from 17 to 710 hours per quarter, depending on an individual institution's circumstances.

For FDIC-insured institutions, Call Report data as of June 30, 2012, indicate that salaries and employee benefits per full-time equivalent employee currently average about $42.50 per hour. Thus, for all 4,531 FDIC-supervised institutions, the annual recurring salary and employee benefit cost for the Call Report burden hours shown above is estimated to be $31.2 million. This cost is based on the application of the $42.50 average hourly rate to the estimated total ongoing annual reporting burden of 735,109 hours.

13. Estimate of Total Annual Cost Burden

Depository institutions maintain extensive internal recordkeeping systems from which financial statements and tax returns are prepared and other reports are generated so that institution management can keep informed about their institution's condition and performance and have the data necessary to operate their institution in a safe and sound manner. These records also serve as a source for the data submitted in the Call Reports, although institutions generally maintain some records solely to enable them to complete these reports. Computerized institutions commonly have software and programs that compile the data that need to be reported in the Call Report. An institution's records may be generated and processed internally, externally by an outside servicer, or by a combination of both methods. In addition, virtually all institutions now use software to assist in the actual preparation of the Call Report.

The estimate of annual burden cited above in Section 12 is primarily the estimated ongoing burden for the quarterly filing of the Call Report. The total operation and maintenance and purchase of services component of the total annual cost burden to FDIC-supervised institutions (excluding costs included in Item 12 above) is estimated to be $20.2 million. This cost is based on the application of an average hourly rate of $27.50 to the estimated total hours of estimated annual reporting burden of 735,109. Thus, this estimate reflects recurring expenses (not included in Item 12 above) incurred by all FDIC-supervised institutions in the Call Report preparation and filing process, including expenses associated with software, data processing, and institution records that are not used internally for management purposes but are necessary to complete the Call Report.

Capital and start-up costs associated with the Call Report change that is the subject of this submission will vary from affected institution to affected institution depending upon an institution's individual circumstances, particularly the composition of its loan portfolio. Thus, an estimate of this cost component cannot be determined at this time.

With respect to the Call Report revision that is the subject of this submission, the disaggregated ALLL data to be reported in proposed Schedule RI-C by institutions with $1 billion or more in total assets are comparable to data already required to be disclosed under GAAP.[4] Because institutions of this size are subject to regulations requiring them to prepare annual financial statements in accordance with GAAP,[5] they should have processes in place to develop the disaggregated ALLL data to be reported in Schedule RI-C. Thus, this new Call Report schedule is expected to nominally increase the overall cost and reporting burden imposed by the Call Report.

14. Estimate of Total Annual Cost to the Federal Government

The current annual cost to the FDIC of the Call Report information collection system is estimated to be not more than $10.0 million. This amount includes the cost of:

- developing reporting requirements, instructions, and data validation edits;
- computer processing and hosting, including maintaining and modifying software programs, associated with the CDR system for collecting and validating Call Reports; and
- FDIC personnel involved in the preceding tasks and in the review and validation of reported data.

The cost to implement the Call Report revisions that are the subject of this submission is encompassed within this annual cost and is not separately identifiable.

[4] Accounting Standards Codification paragraphs 310-10-50-11B (g) and (h) and 310-10-55-7.
[5] 12 CFR Part 363, Annual Independent Audits and Reporting Requirements.

15. Reason for Change in Burden

The change in burden associated with this submission is caused by two factors: (a) a net decrease in the number of reporting institutions supervised by the FDIC, and (b) the change to the Call Report that is the subject of this submission.

At present, there are 4,531 FDIC-supervised institutions, which is 99 less than previously reported (4,630 previously versus 4,531 now). As previously noted, the proposed addition to the Call Report of new Schedule RI-C that is the subject of this submission will apply to institutions with $1 billion or more in total assets. Thus, the FDIC estimates that the overall effect of the proposed reporting revision across the full range of institutions under its supervision would be a nominal increase in the burden estimate per response. In addition, the first year burden for FDIC-supervised savings associations to convert systems and conduct training in connection with their conversion to filing the Call Report in place of the former Thrift Financial Report (TFR) as of the March 31, 2012, report date will be behind them when the proposed addition of Schedule RI-C to the Call Report takes effect. The analysis of the change in burden for the Call Report as it is proposed to be revised effective March 31, 2013, is as follows:

Currently approved burden	
FDIC-supervised institutions: Burden to file	749,923 hours
FDIC-supervised savings associations: First year burden in 2012 to convert systems and conduct training	11,280 hours
Total currently approved burden	761,203 hours
Revisions to content of report (program change)	
FDIC-supervised institutions: Burden to file	+ 1,220 hours
FDIC-supervised savings associations: Elimination of first year burden in 2012 to convert systems and conduct training	- 11,280 hours
Adjustment (change in use)	
FDIC-supervised institutions: Burden to file	- 16,034 hours
Requested (new) burden	735,109 hours
Net change in burden:	- 26,094 hours

The impact of the reporting changes covered by this submission will vary from affected institution to affected institution depending upon an institution's individual circumstances, particularly the composition of its loan portfolio.

16. Publication

The information collected in Call Reports from FDIC-supervised institutions is primarily intended to meet the FDIC's internal needs (see Item 2 above). However, except for the limited number of Call Report data items and the depository institution contact information identified in

Item 10 above as receiving confidential treatment, the FDIC makes individual institutions' entire Call Reports available to the public on the Internet. These data can be accessed on the FFIEC CDR Public Data Distribution Web site (https://cdr.ffiec.gov/public/).

Summary statistical data that provide a financial profile of each individual FDIC-insured institution also are available to the public on the Internet. The financial information is taken from the Call Report and (through December 31, 2011) the TFR and includes balance sheet, income statement, and other key data for several periods. Regulatory capital ratios and profitability ratios such as return on assets and return on equity also are provided. In addition, interested persons can purchase a computer tape containing the quarterly Call Report information for all institutions from the National Technical Information Service of the U.S. Department of Commerce.

Data from the Call Report and (through December 31, 2011) the TFR also form the basis for certain quarterly FDIC publications, including the Quarterly Banking Profile, Statistics on Banking, and Statistics on Depository Institutions, which present a variety of statistical data on the banking industry. These publications are available on the Internet.

The UBPR, which the agencies now process using the CDR system, is generated using Call Report data as its primary input. The UBPR is also publicly available for individual banks (and for individual savings associations beginning with the March 31, 2012, report date) on the FFIEC CDR Public Data Distribution Web site.

17. Display of Expiration Date

Not applicable.

18. Exceptions to Certification

None.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.