Supporting Statement for the
Consolidated Reports of Condition and Income
(FFIEC 031, FFIEC 041, and FFIEC 051; OMB No. 7100-0036)

Summary

The Board of Governors of the Federal Reserve System (Board) requests approval from the Office of Management and Budget (OMB) to extend for three years, with revision, the Federal Financial Institutions Examination Council (FFIEC) Consolidated Reports of Condition and Income (Call Reports) (FFIEC 031, FFIEC 041, and FFIEC 051; OMB No. 7100-0036). These data are required of state member banks and are filed on a quarterly basis. The revisions to the Call Reports that are the subject of this request have been approved by the FFIEC. The Federal Deposit Insurance Corporation (FDIC) and the Office of the Comptroller of the Currency (OCC) have also submitted a similar request for OMB review to request this information from banks under their supervision.

The Board requires information collected on the Call Reports to fulfill its statutory obligation to supervise state member banks. State member banks are required to file both detailed schedules of assets, liabilities, and capital accounts in the form of a condition report and summary statement as well as detailed schedules of operating income and expense, sources and disposition of income, and changes in equity capital.

The Board, the FDIC, and the OCC (the agencies) propose to revise the Call Reports to be submitted on or after April 1, 2018, beginning with the reports reflecting the March 31, 2018, report date, by addressing the changes in the accounting for equity investments to coincide with the first reporting period in which the accounting changes will be adopted under U.S. generally accepted accounting principles (GAAP) by certain reporting institutions. The agencies propose to revise the Call Reports to be submitted on or after July 1, 2018, beginning with the reports reflecting the June 30, 2018, report date, by deleting or consolidating of a large number of items, raising certain reporting thresholds, and reducing the frequency of reporting for a number of items. The agencies also propose to proceed with the scope revision to the FFIEC 031 and FFIEC 041 reports to require all institutions with consolidated total assets of $100 billion or more, regardless of whether an institution has any foreign offices, to file the FFIEC 031. The current annual burden for the Call Reports is estimated to be 177,768 hours and the proposed revisions are estimated to decrease the annual burden by 7,078 hours.

Background and Justification

Banks that are members of the Federal Reserve System are required by law to file reports of condition with the Federal Reserve System. Section 9(6) of the Federal Reserve Act (12 U.S.C. 324) states:

> ... banks ... shall be required to make reports of condition and of the payment of dividends to the Federal Reserve Bank of which they become a member. Not less than three of such reports shall be made annually on call of the Federal Reserve Bank on dates to be fixed by the Board of Governors of the Federal Reserve System. ...Such reports of

condition shall be in such form and shall contain such information as the Board of Governors of the Federal Reserve System may require and shall be published by the reporting banks in such manner and in accordance with such regulations as the said Board may prescribe.

In discharging this statutory responsibility, the Board of Governors, acting in concert with the other federal banking supervisory agencies since 1979 through the FFIEC, requires banks to submit on the quarterly Call Reports such financial data as are needed by the Federal Reserve System to (1) supervise and regulate banks through monitoring of their financial condition, ensuring the continued safety of the public's monies and the overall soundness of the nation's financial structure, and (2) contribute information needed for background for the proper discharge of the Federal Reserve's monetary policy responsibilities. The data, which is made publicly available by the agencies, is used not only by the federal government, but also by state and local governments, the banking industry, securities analysts, and the academic community.

Description of Information Collection

The Call Reports collect basic financial data from commercial banks in the form of a balance sheet, income statement, and supporting schedules. The Report of Condition contains supporting schedules that provide detail on assets, liabilities, and capital accounts. The Report of Income contains supporting schedules that provide detail on income and expenses.

Within the Call Report information collection system as a whole, there are three reporting forms that apply to different categories of banks: (1) all banks that have domestic and foreign offices (FFIEC 031), (2) banks with domestic offices only (FFIEC 041), and (3) banks with domestic offices only and total assets less than $1 billion (FFIEC 051).[1]

There is no other series of reporting forms that collect from all commercial and savings banks the information gathered through the Reports of Condition and Income. There are other information collections that tend to duplicate certain parts of the Call Reports; however, the information they provide would be of limited value as a replacement for the Call Reports. For example, the Board collects various data in connection with its measurement of monetary aggregates, of bank credit, and of flow of funds. Reporting banks supply the Board with detailed information relating to balance sheet accounts such as balances due from depository institutions, loans, and deposit liabilities. The Board also collects financial data from bank holding companies on a regular basis. Such data are presented for the holding company on a consolidated basis, including its banking and nonbanking subsidiaries, and on a parent company only basis.

These reporting forms from banks, however, are frequently obtained on a sample basis rather than from all insured banks. Moreover, these reporting forms are often prepared as of

[1] Prior to March 2001, there were four categories of banks and four reporting forms. The FFIEC 031 was filed by banks with domestic and foreign offices and the FFIEC 032, FFIEC 033, and FFIEC 034 were filed by banks with domestic offices only according to the asset size of the bank. Prior to March 2017, there were two categories of banks and two reporting forms. The FFIEC 031 was filed by banks with domestic and foreign offices and the (2) the FFIEC 041 was filed by banks with domestic offices only.

dates other than the last business day of each quarter, which would seriously limit their comparability. Institutions below a certain size are exempt entirely from some Board reporting requirements. Data collected from bank holding companies on a consolidated basis reflect an aggregate amount for all subsidiaries within the organization, including banking and nonbanking subsidiaries, so that the actual dollar amounts applicable to any bank subsidiary are not determinable from the holding company reporting forms. Hence, these reporting forms could not be a viable replacement for even a significant portion of the Call Reports since the Board, in its role as supervisor of insured state member banks, would be lacking the data necessary to assess the financial condition of individual insured banks to determine whether there had been any deterioration in their condition.

Beginning March 1998, all banks were required to transmit their Call Report data electronically. Banks do not have to submit hard copy Call Reports to any federal bank supervisory agency unless specifically requested to do so.

Proposed Revisions

As part of an initiative launched by the FFIEC in December 2014 to identify potential opportunities to reduce burden associated with Call Report requirements for community banks, the FFIEC and the agencies have taken several actions, including (1) the finalization in mid-2016 of a number of burden-reducing changes and other revisions to the Call Report that were implemented in September 2016 and March 2017; (2) outreach to institutions to obtain a better understanding of significant sources of reporting burden in their Call Report preparation processes; and (3) the creation of a new streamlined FFIEC 051 Call Report for eligible small institutions that took effect as of the March 31, 2017, report date.[2]

As another key part of the FFIEC's community bank burden-reduction initiative, in 2015 the agencies accelerated the start of the next statutorily mandated review of the existing Call Report data items (Full Review),[3] which otherwise would have commenced in 2017. Users of Call Report data items, who are internal staff at the FFIEC member entities, participated in a series of nine surveys conducted over a 19-month period that began in mid-July 2015 and ended in mid-February 2017. As an integral part of these surveys, users were asked to fully explain the need for each Call Report data item they deem essential, how the data item is used, the frequency with which it is needed, and the population of institutions from which it is needed. Call Report schedules were placed into nine groups and prioritized for review, generally based on the level of burden cited by banking industry representatives. Based on the results of the user surveys, the agencies are in the process of identifying data items to be considered for removal, less frequent collection, and new or revised reporting thresholds to reduce burden.

In addition, as a framework for the actions it is undertaking, the FFIEC developed a set of guiding principles for use in evaluating potential additions and deletions of Call Report data

[2] See 80 FR 56539 (September 18, 2015), 81 FR 45357 (July 13, 2016), 81 FR 54190 (August 15, 2016) (referred to hereafter as the "August 2016 Call Report proposal"), and 82 FR 2444 (January 9, 2017) for further information on the actions taken under this initiative.
[3] This review is mandated by section 604 of the Financial Services Regulatory Relief Act of 2006 (12 U.S.C. 1817(a)(11)).

items and other revisions to the Call Report. In general, data items collected in the Call Report must meet three guiding principles: (1) the data items serve a long-term regulatory or public policy purpose by assisting the FFIEC member entities in fulfilling their missions of ensuring the safety and soundness of financial institutions and the financial system and the protection of consumer financial rights, as well as agency-specific missions affecting national and state-chartered institutions; (2) the data items to be collected maximize practical utility and minimize, to the extent practicable and appropriate, burden on financial institutions; and (3) equivalent data items are not readily available through other means.

Based on the results of a portion of the user surveys, the agencies propose various burden-reducing changes in this proposal. A summary of the FFIEC member entities' uses of the data items retained in the Call Report schedules covered in this portion of the user surveys is included in Appendix A. The results of the agencies' initial reviews of the first portion of the user surveys were included in the agencies' August 2016 Call Report proposal for a new streamlined FFIEC 051 Call Report for eligible small institutions and burden-reducing revisions to the existing FFIEC 031 and FFIEC 041 versions of the Call Report, which was finalized in December 2016.[4] The agencies are analyzing the results of the final portion of the user surveys to determine any future proposed revisions to the FFIEC 031, FFIEC 041, and FFIEC 051. Burden-reducing reporting changes from this last group of surveys will be proposed in a future *Federal Register* notice with an anticipated June 30, 2018, implementation date. The schedules reviewed in this last group primarily include schedules that collect data on complex or specialized activities, several of which were removed and replaced by indicator questions and a limited number of indicator items when the new FFIEC 051 was created. Therefore, revisions proposed in this future notice may be likely to more significantly affect schedules and data items in the FFIEC 031 and FFIEC 041.

General Discussion of Proposed Call Report Revisions

The Call Report schedules are being reviewed as part of the Full Review, conducted through a series of nine user surveys. The results of a portion of the surveys were evaluated in the development of this proposal. In addition, the results of certain surveys were re-evaluated and further burden-reducing changes were incorporated into this proposal. In conjunction with these evaluations, the agencies also considered comments received on their August 2016 Call Report proposal, feedback and streamlining suggestions received during their banker outreach activities as part of the community bank Call Report burden-reduction initiative, and comments regarding the Call Report received during the Economic Growth and Regulatory Paperwork Reduction Act review conducted by the FFIEC and the agencies[5] (hereafter collectively referred to as "industry comments and feedback"). The proposed revisions to the FFIEC 031, FFIEC 041, and FFIEC 051, which are based on these analyses of the survey responses and consideration of industry comments and feedback, are discussed below.

[4] See 81 FR 54190 (August 15, 2016) and 82 FR 2444 (January 9, 2017). A summary of the FFIEC member entities' uses of the data items retained in the Call Report schedules covered in the first portion of the user surveys was included in Appendix A of the latter notice.

[5] See the Joint Report to Congress, Economic Growth and Regulatory Paperwork Reduction Act, March 2017, www.ffiec.gov/pdf/2017_FFIEC_EGRPRA_Joint-Report_to_Congress.pdf.

The schedules reviewed in the portion of the user surveys evaluated in the development of this proposal include:

- Schedule RI-D – Income from Foreign Offices (FFIEC 031 only)
- Schedule RI-E – Explanations
- Schedule RC-B – Securities
- Schedule RC-D – Trading Assets and Liabilities (FFIEC 031 and FFIEC 041 only)
- Schedule RC-K – Quarterly Averages
- Schedule RC-L – Derivatives and Off-Balance-Sheet Items
- Schedule RC-M – Memoranda

The schedules re-evaluated in the development of this proposal include:

- Schedule RI – Income Statement
- Schedule RC – Balance Sheet
- Schedule RC-C, Part I – Loans and Leases
- Schedule RC-N – Past Due and Nonaccrual Loans, Leases, and Other Assets

Table 1 summarizes the changes already finalized as part of the FFIEC's community bank Call Report burden-reduction initiative.

Table 1 – Data Items Revised as of March 31, 2017

Finalized Call Report Revisions	051	041	031
Items Removed, Net*	967	60	68
Change in Item Frequency to Semiannual	96		
Change in Item Frequency to Annual	10		
Items with a New or Increased Reporting Threshold		7	13

* "Items Removed, Net" reflects the effects of consolidating existing items, adding control totals, and, for the FFIEC 051, relocating individual items from other schedules to Schedule SU, some of which were consolidated in Schedule SU. In addition, included in this number for the FFIEC 051, approximately 300 items were items that institutions with less than $1 billion in total assets were exempt from reporting due to existing reporting thresholds in the FFIEC 041.

Table 2 summarizes the additional burden-reducing proposed revisions to data items included in this notice. Detail for each affected data item is shown in Appendix B (FFIEC 051), Appendix C (FFIEC 041), and Appendix D (FFIEC 031).

Table 2 – Proposed Data Revisions in this Notice

Proposed Call Report Revisions	051	041	031
Items Proposed to be Removed, Net*	54	106	86
Proposed Change in Item Frequency to Semiannual	17	31	31
Proposed Change in Item Frequency to Annual	26	3	3
Items with a Proposed New or Increased Reporting Threshold	26	106	178

* "Items Proposed to be Removed, Net" reflects the effects of consolidating existing items and relocating individual items to other schedules.

The agencies are also proposing revisions not related to the burden-reduction initiative. The agencies would revise portions of several Call Report schedules to incorporate the revised accounting for equity securities under Accounting Standards Update (ASU) No. 2016-01, "Recognition and Measurement of Financial Assets and Financial Liabilities."

The revisions to the FFIEC 031, FFIEC 041, and FFIEC 051 to address the change in accounting for equity investments would be effective for Call Reports submitted on or after April 1, 2018, beginning with those reflecting the March 31, 2018, report date. However, all other revisions would be effective of Call Reports submitted on or after July 1, 2018, beginning with those reflecting the June 30, 2018, report date.

Detail of Specific Proposed Call Report Revisions

A. Revisions to the FFIEC 051

Schedule RI

For the FFIEC 051, the agencies propose to consolidate securities brokerage and investment banking income items 5.d.(1) and 5.d.(2) into revised item 5.d.(1), consolidate insurance activities income items 5.d.(3) through 5.d.(5) into revised item 5.d.(2), remove securitization income item 5.g, and remove non-deductible interest expense Memorandum item 1 as the agencies no longer need the current level of detail provided by each of these existing items from smaller institutions eligible to file this version of the Call Report. Securitization income would be included within other noninterest income in item 5.l.

Schedule RI-B

For the FFIEC 051, the agencies propose to remove Schedule RI-B, Part II, Memorandum item 4 on allowances for credit losses on purchased credit-impaired loans, as the agencies no longer need this item from smaller institutions eligible to file this version of the Call Report.

Schedule RI-E

For the FFIEC 051, the agencies propose to remove the preprinted captions for items 1.f and 1.h, as few institutions report having these components of other noninterest income in amounts in excess of the existing reporting threshold for disclosing these components.[6] The remaining items 1.g and 1.i through 1.l would be renumbered as items 1.f through 1.j.

In addition, after reviewing the agencies' data needs along with industry comments and feedback requesting a higher threshold for disclosing components of other noninterest income and other noninterest expense in Schedule RI-E, the agencies propose to increase the percentage portion of the existing threshold for reporting other noninterest income components in items 1.a through 1.j and other noninterest expense components in items 2.a through 2.p. The proposed threshold for disclosing components of other noninterest income and other noninterest expense would be amounts greater than $100,000 that exceed seven percent of Schedule RI, item 5.l and item 7.d, respectively.[7] This percentage is currently three percent. Upon evaluating the impact of each percentage threshold, the agencies determined that a percentage threshold of seven percent would provide a meaningful reduction in reporting burden without a loss of data that would be necessary for supervisory or other public policy purposes.

The agencies further propose to reduce the frequency of collection for items 1.a through 1.j and 2.a through 2.p from quarterly to annually as of December 31. This proposal is based on a comment received on the agencies' August 2016 Call Report proposal recommending a reduction in the reporting frequency of these items for smaller institutions.[8] The agencies believe the new reporting frequency better balances the agencies' supervisory needs with institutions' reporting burden.

Schedule RC

For the FFIEC 051, the agencies propose to move the reporting of goodwill from existing item 10.a on the balance sheet to Schedule RC-M, item 2.b, and combine existing items 10.a and 10.b on Schedule RC into a single item 10. This would consolidate the reporting of goodwill and other intangible assets on Schedule RC into a single balance sheet item for intangible assets. This proposed revision to Schedule RC was requested by a commenter on the agencies' August 2016 Call Report proposal to facilitate institutions' reporting by making their Call Report processes more efficient and better focused. While the agencies believe the reporting and disclosure of the amount of an institution's goodwill is important, the agencies are indifferent as to the location of the goodwill information in the Call Report.

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[6] After these two preprinted captions have been removed, if an institution has any other noninterest income component currently disclosed in item 1.f or 1.h in an amount in excess of the reporting threshold, it would itemize and describe this component in one of the subitems of item 1 without a preprinted caption.

[7] The agencies increased the dollar portion of this reporting threshold from $25,000 to $100,000 effective September 30, 2016.

[8] See 82 FR 2444 (January 9, 2017) for discussion of the comments received on the August 2016 Call Report proposal.

Schedule RC-B

For the FFIEC 051, the agencies propose to consolidate the reporting of an institution's holdings of U.S. government agency obligations, which are currently reported in items 2.a and 2.b, into a single item 2, and to consolidate the reporting of structured financial product holdings, which are currently reported in items 5.b.(1) through 5.b.(3), into a single item 5.b, as the agencies no longer need the current level of detail for these holdings in the Call Report. Banks would still be required to report amortized cost and fair value information in columns A through D for the proposed items 2 and 5.b. The agencies also propose to reduce the reporting frequency of the data on sales and transfers of held-to-maturity securities reported in Memorandum item 3 from quarterly to semiannual (June 30 and December 31), as the agencies no longer need these data items as frequently. This proposal is consistent with industry comments and feedback recommending a shorter reporting form for two of the four quarters each year. The agencies also propose to remove Memorandum items 6.a through 6.g, which provide detail on holding of structured financial products, as smaller institutions eligible to file this version of the Call Report generally do not hold these securities.

Schedule RC-C, Part I

For the FFIEC 051, the agencies propose to reduce the reporting frequency of Memorandum items 7.a, 7.b, 8.a, and 12 (Columns A through C) from quarterly to semiannual (June 30 and December 31), as the agencies no longer need these loan data in the Call Report as frequently. This proposal is consistent with industry comments and feedback recommending a shorter reporting form for two of the four quarters each year.

Schedule RC-K

For the FFIEC 051, the agencies propose to remove item 7, average trading assets, as the agencies no longer need this quarterly average in the Call Report from institutions with domestic offices only and assets less than $1 billion.

Schedule RC-L

For the FFIEC 051, the agencies propose to remove items 1.b.(1), 1.b.(2), and 1.d, as the agencies no longer need the current level of detail for these types of unused commitments from smaller institutions eligible to file this version of the Call Report.[9] The agencies also propose to reduce the reporting frequency of merchant credit card sales data in items 11.a and 11.b from quarterly to semiannual (June 30 and December 31), as the agencies no longer need this information in the Call Report as frequently. This proposal is consistent with industry comments and feedback recommending a shorter reporting form for smaller institutions for two of the four quarters each year.

[9] Any securities underwriting commitments currently reported in item 1.d would be included as part of all other unused commitments in item 1.e.(3).

Schedule RC-M

For the FFIEC 051, the agencies propose to consolidate current items 2.b and 2.c, which provide data on certain identifiable intangible assets, into a single item 2.c,[10] and to consolidate other real estate owned items 3.c and 3.f into a single item 3.c, as the agencies no longer need the current level of detail in the Call Report that is provided in these separate items. As discussed earlier under Schedule RC, the agencies are moving the goodwill amount formerly reported in Schedule RC, item 10.a, to a recaptioned item 2.b on Schedule RC-M.

Schedule RC-N

For the FFIEC 051, the agencies propose to reduce the reporting frequency of Memorandum items 7 and 8 on nonaccrual assets and Memorandum items 9.a and 9.b on purchased credit-impaired loans from quarterly to semiannual (June 30 and December 31), as the agencies no longer need these data in the Call Report as frequently. In connection with this proposed change, Memorandum items 7 and 8 would collect data on additions to nonaccrual assets and nonaccrual asset sales, respectively, during the preceding six months rather than the preceding quarter as at present. This proposal is consistent with industry comments and feedback recommending a shorter reporting form for two of the four quarters each year.

B. Revisions to the FFIEC 041

Scope Revision

The agencies propose to revise the scope of the FFIEC 041 to require all institutions with consolidated total assets of $100 billion or more to file the FFIEC 031 instead, regardless of whether an institution has any foreign offices. The agencies are proposing this change because institutions with consolidated total assets of $100 billion or more without foreign offices are considered to have a similar degree of complexity in their activities as institutions with consolidated total assets of $100 billion or more and foreign offices that currently file the FFIEC 031. This scope revision would affect a small number of institutions. Also, modifying the scope of these two versions of the Call Report in this manner would enable the agencies to remove a number of data items from the FFIEC 041 report that they no longer need to collect from institutions with consolidated total assets less than $100 billion.

Schedule RI

For the FFIEC 041, the agencies propose to remove detail on trading revenues in Memorandum items 8.a through 8.e, as the agencies no longer need this level of detail in the Call Report from institutions with total assets less than $100 billion. The agencies would also remove Memorandum items 8.f through 8.h, which currently only apply to institutions with total assets of $100 billion or more. In addition, the agencies propose to reduce the reporting frequency of Memorandum item 12 from quarterly to semiannual (June 30 and December 31), as the agencies no longer need this data in the Call Report as frequently.

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[10] As explained in the description of the proposed revisions to Schedule RC of the FFIEC 051, existing item 2.b of Schedule RC-M would be replaced by a revised item 2.b for reporting goodwill.

Schedule RI-E

For the FFIEC 041, the agencies propose to remove the preprinted captions for items 1.f and 1.h, as few institutions report having these components of other noninterest income in amounts in excess of the existing reporting threshold for disclosing these components.[11] The remaining items 1.g and1.i through 1.l would be renumbered as items 1.f through 1.j.

In addition, after reviewing the agencies' data needs along with industry comments and feedback requesting a higher threshold for disclosing components of other noninterest income and other noninterest expense in Schedule RI-E, the agencies propose to increase the percentage portion of the existing threshold for reporting other noninterest income components in items 1.a through 1.j and other noninterest expense components in items 2.a through 2.p. The proposed threshold for disclosing components of other noninterest income and other noninterest expense would be amounts greater than $100,000 that exceed seven percent of Schedule RI, item 5.l and item 7.d, respectively.[12] This percentage is currently three percent. Upon evaluating the impact of each percentage threshold, the agencies determined that a percentage threshold of seven percent would provide a meaningful reduction in reporting burden without a loss of data that would be necessary for supervisory or other public policy purposes.

Schedule RC

For the FFIEC 041, the agencies propose to move the reporting of goodwill from existing item 10.a on the balance sheet to Schedule RC-M, item 2.b, and combine existing items 10.a and 10.b on Schedule RC into a single item 10. This would consolidate the reporting of goodwill and other intangible assets on Schedule RC into a single balance sheet item for intangible assets. This proposed revision to Schedule RC was requested by a commenter on the agencies' August 2016 Call Report proposal to facilitate institutions' reporting by making their Call Report processes more efficient and better focused.[13] While the agencies believe the reporting and disclosure of the amount of an institution's goodwill detail is important, the agencies are indifferent as to the location of the information in the Call Report.

Schedule RC-B

For the FFIEC 041, the agencies propose to consolidate the reporting of an institution's holdings of U.S. government agency obligations, which are currently reported in items 2.a and 2.b, into a single item 2, and to consolidate the reporting of structured financial product holdings, which are currently reported in items 5.b.(1) through 5.b.(3), into a single item 5.b, as the agencies no longer need the current level of detail for these holdings in the Call Report. Institutions would still be required to report amortized cost and fair value information in columns A through D for the proposed items 2 and 5.b. The agencies also propose to reduce the reporting

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[11] If an institution has the component of other noninterest income currently disclosed in item 1.f or 1.h in an amount in excess of the reporting threshold, it would itemize and describe this component in one of the subitems of item 1 without a preprinted caption.

[12] The agencies increased the dollar portion of this reporting threshold from $25,000 to $100,000 effective September 30, 2016.

[13] See 82 FR 2444 (January 9, 2017) for discussion of the comments received on the August 2016 Call Report proposal.

frequency of the data on sales and transfers of held-to-maturity securities reported in Memorandum item 3 from quarterly to semiannual (June 30 and December 31), as the agencies no longer need these data items in the Call Report as frequently. This proposal is consistent with industry comments and feedback recommending a shorter reporting form for two of the four quarters each year.[14] The agencies also propose to add a reporting threshold of $10 billion or more in total assets before institutions must complete Memorandum items 5.a though 6.g, columns A through D, as the agencies no longer need this information in the Call Report from institutions under this proposed threshold.

Schedule RC-C, Part I

For the FFIEC 041, the agencies propose to reduce the reporting frequency of Memorandum items 7.a, 7.b, 8.a, 8.b, 8.c, and 12.a through 12.d (columns A through C) from quarterly to semiannual (June 30 and December 31), as the agencies no longer need these loan data in the Call Report as frequently. This proposal is consistent with industry comments and feedback recommending a shorter reporting form for two of the four quarters each year.

Schedule RC-D

For the FFIEC 041, the agencies propose to change the reporting threshold for the overall schedule so that the schedule would be applicable to institutions with total trading assets of $10 million or more in any of the four preceding calendar quarters from the current threshold of $2 million in average trading assets over this same period. In addition, all institutions meeting the FDIC's definition of a large institution or a highly complex institution for deposit insurance assessment purposes would be required to complete Schedule RC-D. The agencies are proposing this reporting threshold change because they no longer need to collect this detailed data in the Call Report from institutions with a lesser amount of trading assets that are not large or highly complex institutions.

The agencies also propose to consolidate:

- Structured financial products in current items 5.a.(1) through 5.a.(3) into a single new item 5.a;
- Loan detail in current items 6.a.(1), 6.a.(2), 6.a.(4), and 6.a.(5) into a single new item 6.a.(2);
- Certain residential loan detail in current items 6.a.(3)(a) through 6.a.(3)(b)(2) into a single new item 6.a.(1);
- Consumer loan information in items 6.c.(1) through 6.c.(4) into a single item 6.c;
- Loan detail in current Memorandum items 1.a.(1), 1.a.(2), 1.a.(4), and 1.a.(5) into a single new Memorandum item 1.a.(2);
- Certain residential loan detail in current Memorandum items 1.a.(3)(a) through 1.a.(3)(b)(2) into a single new Memorandum item 1.a.(1); and
- Consumer loan information in Memoranda items 1.c.(1) through 1.c.(4) into a single new Memorandum item 1.c.

The agencies no longer need to collect the existing level of detail in the Call Report from

[14] See 82 FR 2444 (January 9, 2017).

those institutions that would be required to complete Schedule RC-D under its proposed revised reporting threshold. The agencies also propose to remove Memorandum items 2.a though 10, as the agencies no longer need to collect the current level of detail in the Call Report from institutions with less than $100 billion in total assets.

Schedule RC-K

For the FFIEC 041, the agencies propose to revise the reporting threshold for item 7 on average trading assets. This item would only need to be completed by institutions with $10 million or more in total trading assets in any of the four preceding calendar quarters and by all institutions meeting the FDIC's definition of a "large institution" or a "highly complex institution" for deposit insurance assessment purposes. This proposed revised reporting threshold is consistent with the proposed threshold for completing Schedule RC-D discussed above. The agencies no longer need this quarterly average in the Call Report from institutions with less than $10 million in trading assets that are not large or highly complex institutions.

Schedule RC-L

For the FFIEC 041, the agencies propose to consolidate items 1.a.(1) and 1.a.(2) into a single item 1.a.(1), as the agencies no longer need the current level of detail in the Call Report for these types of unused commitments. The agencies also propose to remove item 8 on spot foreign exchange contracts, as the agencies no longer need this information in the Call Report from all institutions with assets less than $100 billion. By removing item 8, spot foreign exchange contracts would be reported as part of an institution's all other off-balance sheet liabilities in item 9 of Schedule RC-L if the amount of such contracts exceeds 10 percent of the institution's total equity capital. Spot foreign exchange contracts would be disclosed as a component of the institution's all other off-balance sheet liabilities if the amount exceeds 25 percent of total equity capital.

The agencies also propose to remove columns B, C, and D, for items 16.a through 16.b.(8), and instead include these data on over-the-counter derivatives within column E for derivatives with all other counterparties. The agencies no longer need the separate detail in the Call Report provided by the disaggregated data on over-the-counter derivatives for monoline financial guarantors, hedge funds, and sovereign governments for institutions filing the FFIEC 041. The agencies also propose removing items 16.b.(4) though 16.b.(6) for the remaining columns A and E, and instead including the fair value of the three types of securities collateral currently reported in items 16.b.(4) through 16.b.(6) within the collateral amount reported in the respective columns of item 16.b.(7). The agencies no longer need the separate breakout of these types of collateral in the Call Report for institutions filing the FFIEC 041.

The agencies also propose to reduce the reporting frequency of items 1.b.(1), 1.b.(2), 11.a, and 11.b from quarterly to semiannual (June 30 and December 31), as the agencies no longer need these data in the Call Report as frequently. This proposal is consistent with industry comments and feedback recommending a shorter reporting form for two of the four quarters each year.

Schedule RC-M

For the FFIEC 041, the agencies propose to consolidate items 2.b and 2.c, which provide data on certain identifiable intangible assets, into a single item 2.c,[15] and to consolidate other real estate owned items 3.c and 3.f into a single item 3.c, as the agencies no longer need the current level of detail in the Call Report that is provided in these separate items. As discussed earlier under Schedule RC, the agencies are moving the goodwill amount formerly reported in Schedule RC, item 10.a, to a recaptioned item 2.b on Schedule RC-M. The agencies also propose to reduce the reporting frequency for items 9 (website transactional capability), 14.a (captive insurance subsidiary assets), and 14.b (captive reinsurance subsidiary assets) from quarterly to annual (December 31), as the agencies no longer need these data in the Call Report as frequently.

Schedule RC-N

For the FFIEC 041, the agencies propose to reduce the reporting frequency of Memorandum items 7 and 8 on nonaccrual assets and Memorandum items 9.a and 9.b (columns A through C) on purchased credit-impaired loans from quarterly to semiannual (June 30 and December 31), as the agencies no longer need these data in the Call Report as frequently. In connection with this proposed change, Memorandum items 7 and 8 would collect data on additions to nonaccrual assets and nonaccrual asset sales, respectively, during the preceding six months rather than the preceding quarter as at present. This proposal is consistent with industry comments and feedback recommending a shorter reporting form for two of the four quarters each year.

C. Revisions to the FFIEC 031

Scope Revision

The agencies propose to revise the scope of the FFIEC 031 to require all institutions with consolidated total assets of $100 billion or more to file this form, regardless of whether an institution has any foreign offices. The agencies are proposing this change because institutions with consolidated total assets of $100 billion or more without foreign offices are considered to have a similar degree of complexity in their activities as institutions of this size with foreign offices that currently file the FFIEC 031.

Schedule RI

For the FFIEC 031, the agencies propose to change the reporting threshold for reporting information on trading revenues in Memorandum items 8.a through 8.e. Currently, these items are completed by institutions that reported average trading assets of $2 million or more for any quarter of the preceding calendar year. The agencies propose to modify the reporting threshold for Memorandum items 8.a through 8.e to instruct that these items be completed by institutions that reported total trading assets of $10 million or more for any quarter of the preceding calendar year, as the agencies no longer need this level of detail in the Call Report from institutions with

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[15] As explained in the description of the proposed revisions to Schedule RC of the FFIEC 041, existing item 2.b of Schedule RC-M would be replaced by a revised item 2.b for reporting goodwill.

lower levels of trading assets. In addition, the agencies propose to reduce the reporting frequency of Memorandum item 12 from quarterly to semiannual (June 30 and December 31), as the agencies no longer need this data in the Call Report as frequently.

Schedule RI-D

For the FFIEC 031, the agencies propose to change the reporting threshold for completing this schedule. Currently, this schedule is required to be completed by an institution when its foreign office revenues, assets, or net income exceed 10 percent of consolidated total revenues, total assets, or net income. The agencies propose to add an additional threshold that an institution must have foreign office assets of $10 billion or more and also meet one of the three 10 percent tests before the schedule is required, as the agencies no longer need foreign office income data in the Call Report from institutions with a lesser amount of foreign office assets.

Schedule RI-E

For the FFIEC 031, the agencies propose to remove the preprinted captions for items 1.f and 1.h, as few institutions report having these components of other noninterest income in amounts in excess of the existing reporting threshold for disclosing these components.[16] The remaining items 1.g and 1.i through 1.l would be renumbered as items 1.f through 1.j.

In addition, after reviewing the agencies' data needs along with industry comments and feedback requesting a higher threshold for disclosing components of other noninterest income and other noninterest expense in Schedule RI-E, the agencies propose to increase the percentage portion of the existing threshold for reporting other noninterest income components in items 1.a through 1.j and other noninterest expense components in items 2.a through 2.p. The proposed threshold for disclosing components of other noninterest income and other noninterest expense would be amounts greater than $100,000 that exceed seven percent of Schedule RI, item 5.l, and item 7.d, respectively.[17] This percentage is currently three percent. Upon evaluating the impact of each percentage threshold, the agencies determined that a percentage threshold of seven percent would provide a meaningful reduction in reporting burden without a loss of data that would be necessary for supervisory or other public policy purposes.

Schedule RC

For the FFIEC 031, the agencies propose to move the reporting of goodwill from existing item 10.a on the balance sheet to Schedule RC-M, item 2.b (as discussed further below), and combine existing items 10.a and 10.b on Schedule RC into a single item 10. This would consolidate the reporting of goodwill and other intangible assets on Schedule RC into a single balance sheet item for intangible assets. This proposed revision to Schedule RC was requested by a commenter on the agencies' August 2016 Call Report proposal to facilitate institutions'

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[16] If an institution has the component of other noninterest income currently disclosed in item 1.f or 1.h in an amount in excess of the reporting threshold, it would itemize and describe this component in one of the subitems of item 1 without a preprinted caption.

[17] The agencies increased the dollar portion of this reporting threshold from $25,000 to $100,000 effective September 30, 2016.

reporting by making their Call Report processes more efficient and better focused.[18] While the agencies believe the reporting and disclosure of an institution's goodwill detail is important, the agencies are indifferent as to the location of the information in the Call Report.

Schedule RC-B

For the FFIEC 031, the agencies propose to consolidate the reporting of an institution's holdings of U.S. government agency obligations, which are currently reported in items 2.a and 2.b, into a single item 2, and to consolidate the reporting of structured financial product holdings, which are currently reported in items 5.b.(1) through 5.b.(3), into a single item 5.b, as the agencies no longer need the current level of detail in the Call Report for these holdings. Institutions would still be required to report amortized cost and fair value information in columns A through D for the proposed items 2 and 5.b. The agencies also propose to reduce the reporting frequency of the data on sales and transfers of held-to-maturity securities reported in Memorandum item 3 from quarterly to semiannual (June 30 and December 31), as the agencies no longer need these data items as frequently in the Call Report. The agencies also propose to add a reporting threshold of $10 billion or more in total assets before institutions must complete Memorandum items 5.a though 6.g, columns A through D, as the agencies no longer need this information in the Call Report from institutions under this proposed threshold.

Schedule RC-C, Part I

For the FFIEC 031, the agencies propose to reduce the reporting frequency of Memorandum items 7.a, 7.b, 8.a, 8.b, 8.c, and 12.a through 12.d (columns A through C) from quarterly to semiannual (June 30 and December 31), as the agencies no longer need these loan data in the Call Report as frequently.

Schedule RC-D

For the FFIEC 031, the agencies propose to change the reporting threshold for the overall schedule so that the schedule would be applicable to institutions with total trading assets of $10 million or more in any of the four preceding calendar quarters from the current threshold of $2 million or more in average trading assets over this same period. In addition, all institutions meeting the FDIC's definition of a large institution or a highly complex institution for deposit insurance assessment purposes would be required to complete Schedule RC-D. The agencies are proposing this reporting threshold change because they no longer need to collect the existing detailed data in the Call Report from institutions with a lesser amount of trading assets that are not large or highly complex institutions.

The agencies also propose to consolidate:

- Structured financial products in items 5.a.(1) through 5.a.(3) into a single item 5.a;
- Loan detail in current items 6.a.(1), 6.a.(2), 6.a.(4), and 6.a.(5) into a single new item 6.a.(2);
- Certain residential loan detail in current items 6.a.(3)(a) through 6.a.(3)(b)(2) into a single

[18] See 82 FR 2444 (January 9, 2017) for discussion of the comments received on the August 2016 Call Report proposal.

new item 6.a.(1);

- Consumer loan information in items 6.c.(1) through 6.c.(4) into a single item 6.c;
- Loan detail in Memorandum items 1.a.(1), 1.a.(2), 1.a.(4), and 1.a.(5) into a single new Memorandum item 1.a.(2);
- Certain residential loan detail in Memorandum items 1.a.(3)(a) through 1.a.(3)(b)(2) into a single new Memorandum item 1.a.(1); and
- Consumer loan information in Memorandum items 1.c.(1) through 1.c.(4) into a single new Memorandum item 1.c.

The agencies no longer need to collect the current level of detail in the Call Report from those institutions that would be required to complete Schedule RC-D under its proposed revised reporting threshold.

The agencies also propose to remove column B (domestic offices) for all items on Schedule RC-D, except for items 12 and 15 on total trading assets and total trading liabilities in domestic offices, respectively, which will be moved to Schedule RC-H, Selected Balance Sheet Items for Domestic Offices. In addition, the agencies would replace the detailed data on loans held for trading in domestic offices that is reported in items 6.a.(1) through 6.d, column B, of Schedule RC-D with a single new item for total loans held for trading in domestic offices that would be added to Schedule RC-H. The agencies propose these changes as they no longer need separately reported data in the Call Report on assets and liabilities held for trading in domestic offices other than for the three items on total trading assets, total trading liabilities, and total loans held for trading in domestic offices that would be reported in Schedule RC-H. Institutions would continue to report amounts in Schedule RC-D only for the consolidated entity, which they currently report in column A.

In addition, the agencies propose to add a reporting threshold of $10 billion or more in total trading assets before an institution would be required to complete Memorandum items 2.a though 5.f and 7.a through 10, as the agencies no longer need this level of detail in the Call Report from institutions with a lesser amount of trading assets. The agencies also propose to remove Memorandum item 6, as the agencies no longer need this information.

Schedule RC-H

For the FFIEC 031, in connection with removing the separate detail for trading assets and liabilities in domestic offices from Schedule RC-D, the agencies propose to retain and relocate selected data items to Schedule RC-H, Selected Balance Sheet Items for Domestic Offices. As noted above, the agencies propose relocating total trading assets and total trading liabilities in domestic offices from Schedule RC-D, column B, items 12 and 15, to Schedule RC-H, new items 19 and 20, respectively. Also, the agencies propose to aggregate all loans held for trading in domestic offices currently reported on Schedule RC-D, column B, items 6.a through 6.d (including all subitems), into a single new item, Schedule RC-H, item 21. These three items would be completed by institutions that reported total trading assets of $10 million or more in any of the four preceding calendar quarters and by all institutions meeting the FDIC's definition of a large or highly complex institution for deposit insurance assessment purposes. The agencies believe relocating this data from Schedule RC-D to Schedule RC-H will improve efficiency by consolidating additional domestic office information on Schedule RC-H.

Schedule RC-K

For the FFIEC 031, the agencies propose to add a reporting threshold for item 7 on average trading assets. This item would only need to be completed by institutions with $10 million or more in total trading assets in any of the four preceding calendar quarters and by all institutions meeting the FDIC's definition of a "large institution" or a "highly complex institution" for deposit insurance assessment purposes. This proposed new reporting threshold is consistent with the proposed revised threshold for completing Schedule RC-D discussed above. The agencies no longer need this information in the Call Report each quarter from institutions with less than $10 million in trading assets that are not large or highly complex institutions.

Schedule RC-L

For the FFIEC 031, the agencies propose to consolidate items 1.a.(1) and 1.a.(2) into a single item 1.a.(1), as the agencies no longer need the current level of detail for these types of unused commitments. The agencies also propose to remove column B for items 16.a through 16.b.(8), and instead include these data on over-the-counter derivatives within column E for derivatives with all other counterparties. The agencies no longer need the separate detail in the Call Report provided by the disaggregated data on over-the-counter derivatives for monoline financial guarantors in column B. The agencies also propose to reduce the reporting frequency of items 1.b.(1), 1.b.(2), 11.a, and 11.b from quarterly to semiannual (June 30 and December 31), as the agencies no longer need these data in the Call Report as frequently.

Schedule RC-M

For the FFIEC 031, the agencies propose to consolidate items 2.b and 2.c, which provide data on certain intangible assets, into a single item 2.c,[19] and to consolidate other real estate owned items 3.c and 3.f into a single item 3.c, as the agencies no longer need the current level of detail in the Call Report that is provided in these separate items. As discussed earlier under Schedule RC, the agencies are moving the goodwill amount formerly reported in Schedule RC, item 10.a, to a recaptioned item 2.b on Schedule RC M. The agencies also propose to reduce the reporting frequency for items 9 (website transactional capability), 14.a (captive insurance subsidiary assets), and 14.b (captive reinsurance subsidiary assets) from quarterly to annual (December 31), as the agencies no longer need these data in the Call Report as frequently.

Schedule RC-N

For the FFIEC 031, the agencies propose to reduce the reporting frequency of Memorandum items 7 and 8 on nonaccrual assets and Memorandum items 9.a and 9.b on purchased credit-impaired loans from quarterly to semiannual (June 30 and December 31), as the agencies no longer need these data in the Call Report as frequently. In connection with this proposed change, Memorandum items 7 and 8 would collect data on additions to nonaccrual

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[19] As explained in the description of the proposed revisions to Schedule RC of the FFIEC 031, existing item 2.b of Schedule RC-M would be replaced by a revised item 2.b for reporting goodwill.

assets and nonaccrual asset sales, respectively, during the preceding six months rather than the preceding quarter as at present.

D. Additional Proposed Revisions to All Versions of the Call Report

Proposed Call Report Revisions to Address Changes in Accounting for Equity Investments

In January 2016, the Financial Accounting Standards Board (FASB) issued ASU 2016-01, “Recognition and Measurement of Financial Assets and Financial Liabilities.” In its summary of this ASU, the FASB described how one of the main provisions of the ASU differs from current U.S. generally accepted accounting principles (GAAP) as follows:

> The amendments in this Update supersede the guidance to classify equity securities with readily determinable fair values into different categories (that is, trading or available-for-sale) and require equity securities (including other ownership interests, such as partnerships, unincorporated joint ventures, and limited liability companies) to be measured at fair value with changes in the fair value recognized through net income. An entity’s equity investments that are accounted for under the equity method of accounting or result in consolidation of an investee are not included within the scope of this Update.

The FASB further stated in the summary that “an entity may choose to measure equity investments that do not have readily determinable fair values at cost minus impairment, if any, plus or minus changes resulting from observable price changes in orderly transactions for the identical or a similar investment of the same issuer.”

Section 37(a) of the Federal Deposit Insurance Act (12 U.S.C. 1831n(a)) states that, in general, the accounting principles applicable to the Call Report “shall be uniform and consistent with generally accepted accounting principles.” The agencies are maintaining consistency with U.S. GAAP by implementing the provisions of ASU 2016 01 in the Call Report in accordance with the effective dates set forth in the ASU. For institutions that are public business entities, as defined in U.S. GAAP, ASU 2016-01 is effective for fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. For all other institutions, the ASU is effective for fiscal years beginning after December 15, 2018, and interim periods within fiscal years beginning after December 15, 2019.

One outcome of the change in accounting for equity investments under ASU 2016-01 is the elimination of the concept of available-for-sale (AFS) equity securities, which are measured at fair value on the balance sheet with changes in fair value recognized through other comprehensive income. At present, the historical cost and fair value of AFS equity securities, i.e., investments in mutual funds and other equity securities with readily determinable fair values that are not held for trading, are reported in Call Report Schedule RC-B, item 7, columns C and D, respectively. The total fair value of AFS securities, which includes both debt and equity securities, is then carried forward to the Call Report balance sheet and reported in Schedule RC, item 2.b. In the FFIEC 041 and FFIEC 031 Call Reports, the total fair value of AFS securities reported in Schedule RC, item 2.b, also is reported in item 1, column A, of Schedule RC-Q, Assets and Liabilities Measured at Fair Value on a Recurring Basis, by institutions required to complete this schedule.[20] These institutions then report in columns C, D, and E of item 1 a breakdown of their AFS debt securities by the level in the fair value hierarchy within which the fair value amounts of these securities fall (Level 1, 2, or 3). Any balance sheet netting adjustments to these fair value amounts are reported in column B of item 1.

In addition, the total fair value of AFS securities is reported in Schedule RC-R, Part II, for risk-weighting purposes under the agencies' regulatory capital rules. This fair value amount is reported in Schedule RC-R, Part II, item 2.b, column A, except for the fair value of those AFS securities that qualify as securitization exposures, which is reported in Schedule RC-R, Part II, item 9.b, column A. To the extent appropriate under the regulatory capital rules, adjustments to the fair values reported in column A of items 2.b and 9.b are reported in column B. The adjusted amount in item 2.b is then allocated to the appropriate risk-weight category in columns C through N. The adjusted amount of AFS securitization exposures in item 9.b is reported by risk-weight category in column Q or by risk-weighted asset amount in column T or U based on the risk-weighting approach or approaches applied by an institution.

At present, the accumulated balance of the unrealized gains (losses) on AFS equity securities, net of applicable income taxes, that have been recognized through other comprehensive income is included in accumulated other comprehensive income (AOCI), which is reported in the equity capital section of the Call Report balance sheet in Schedule RC, item 26.b. With the elimination of AFS equity securities on the effective date of ASU 2016-01, the net unrealized gains (losses) on these securities that had been included in AOCI will be reclassified (transferred) from AOCI into the retained earnings component of equity capital, which is reported on the Call Report balance sheet in Schedule RC, item 26.a. After the effective date, changes in the fair value of (i.e., the unrealized gains and losses on) an institution's equity securities that would have been classified as AFS had the previously applicable accounting standards remained in effect will be recognized through net income rather than other comprehensive income.

The effect of the elimination of AFS equity securities as a distinct asset category upon institutions' implementation of ASU 2016-01 carries over to the agencies' regulatory capital rules. Under these rules, institutions that are eligible to and have elected to make the AOCI opt-out election deduct net unrealized losses on AFS equity securities from common equity tier 1 capital and include 45 percent of pretax net unrealized gains on AFS equity securities in tier 2 capital. For purposes of reporting regulatory capital components and ratios in the Call Report, the deduction of these net unrealized losses is currently effected through the combination of Schedule RC-R, Part I, items 9.a, "LESS: Net unrealized gains (losses) on available-for-sale securities," and 9.b, "LESS: Net unrealized loss on available-for-sale preferred stock classified as an equity security under GAAP and available-for-sale equity exposures." The inclusion of 45 percent of pretax net unrealized gains in tier 2 capital currently occurs through the reporting of this percentage of an institution's gains in Schedule RC-R, Part I, item 31, "Unrealized gains on

[20] Schedule RC-Q is to be completed by (1) institutions that had total assets of $500 million or more as of the beginning of their fiscal year and (2) other institutions that either have elected to report financial instruments or servicing assets and liabilities at fair value under a fair value option or are required to complete Schedule RC-D, Trading Assets and Liabilities. Schedule RC-Q is not included in the FFIEC 051 Call Report.

available-for-sale preferred stock classified as an equity security under GAAP and available-for-sale equity exposures includable in tier 2 capital." When ASU 2016-01 takes effect and the classification of equity securities as AFS is eliminated for accounting and reporting purposes under U.S. GAAP, the concept of unrealized gains and losses on AFS equity securities will likewise cease to exist.

Another outcome of the change in accounting for equity investments under ASU 2016-01 is that equity securities and other equity investments without readily determinable fair values that are within the scope of ASU 2016-01 and are not held for trading must be measured at fair value through net income, rather than at cost (less impairment, if any), unless the measurement election described above is applied to individual equity investments. In general, institutions currently report their holdings of such equity securities without readily determinable fair values as a category of other assets in Call Report Schedule RC-F, item 4. The total amount of an institution's other assets is reported on the Call Report balance sheet in Schedule RC, item 11.

At present, AFS equity securities and equity investments without readily determinable fair values are included in the quarterly averages reported in Schedule RC K. Institutions report the quarterly average for "All other securities" in item 4 of this schedule and this average reflects AFS equity securities at historical cost. A quarterly average for total assets is reported in item 9 of Schedule RC-K. Among its uses, average total assets serves as the starting point for determining the denominator for the tier 1 leverage ratio under the agencies' regulatory capital rules. The quarterly average for total assets currently reflects AFS equity securities at the lower of cost or fair value and equity securities without readily determinable fair values at historical cost. Finally, institutions with foreign offices report the fair value of their AFS equity securities in domestic offices and the historical cost of their equity securities without readily determinable fair values in domestic offices in Schedule RC-H, items 16 and 18, respectively, of the FFIEC 031 Call Report. The domestic office holdings of these equity securities are components of the AFS equity securities and equity securities without readily determinable fair values reported on a consolidated basis in Schedule RC-B, item 7, and Schedule RC-F, item 4, respectively.

The agencies have considered the changes to the accounting for equity investments under ASU 2016-01 and the effect of these changes on the manner in which data on equity securities and other equity investments is currently reported in the Call Report. The agencies also note that, because of the different effective dates for ASU 2016-01 for public business entities and all other entities, as well as the varying fiscal years across the population of institutions that file Call Reports, the period over which institutions will be implementing this ASU ranges from the first quarter of 2018 through the fourth quarter of 2020. December 31, 2020, will be the first quarter-end Call Report date as of which all institutions would be required to prepare their Call Reports in accordance with ASU 2016-01. As a result, the agencies are proposing revisions to the reporting of information on equity securities and other equity investments in response to the ASU that would be introduced in the Call Report effective March 31, 2018, but would not be fully phased in until the Call Report for December 31, 2020. In developing these proposed Call Report revisions, the agencies have followed the guiding principles for evaluating potential additions and deletions of Call Report data items and other revisions to the Call Report identified above. In following these principles, the agencies have sought to limit the number of data items being added to the Call Report to address the changes in accounting for equity securities and other equity investments.

The proposed Call Report revisions related to equity securities are as follows:

(1) To provide transparency to the effect of unrealized gains and losses on equity securities not held for trading on an institution's net income during the year-to-date reporting period in Schedule RI, Income Statement, and to clearly distinguish these gains and losses from the rest of an institution's income (loss) from its continuing operations, Schedule RI, item 8, would be revised effective March 31, 2018, by creating new items 8.a, "Income (loss) before unrealized holding gains (losses) on equity securities not held for trading, applicable income taxes, and discontinued operations," and 8.b, "Unrealized holding gains (losses) on equity securities not held for trading." In addition to unrealized holding gains (losses) during the year-to-date reporting period on such equity securities with readily determinable fair values, institutions also would report in proposed new item 8.b the year-to-date changes in the carrying amounts of equity investments without readily determinable fair values not held for trading (i.e., unrealized holding gains (losses) for those measured at fair value through earnings; impairment, if any, plus or minus changes resulting from observable price changes for those equity investments for which this measurement election is made). Existing Schedule RI, item 8, "Income (loss) before applicable income taxes and discontinued operations," would be renumbered as item 8.c, and would be the sum of items 8.a and 8.b. From March 31, 2018, through September 30, 2020, the instructions for item 8.b and the reporting form for Schedule RI would include guidance stating that item 8.b is to be completed only by institutions that have adopted ASU 2016-01. Institutions that have not adopted ASU 2016-01 would leave item 8.b blank when completing Schedule RI. Finally, from March 31, 2018, through September 30, 2020, the instructions for Schedule RI, item 6.b, "Realized gains (losses) on available-for-sale securities," and the reporting form for Schedule RI would include guidance stating that, for institutions that have adopted ASU 2016-01, item 6.b includes realized gains (losses) only on AFS debt securities. Effective December 31, 2020, the caption for item 6.b would be revised to "Realized gains (losses) on available-for-sale debt securities."

(2) On the FFIEC 031, certain institutions with foreign offices must complete Schedule RI-D, Income from Foreign Offices. As stated in the instructions for Schedule RI-D, "[f]or the most part, the income and expense items in Schedule RI-D mirror categories of income and expense reported in Schedule RI." However, Schedule RI-D collects much less detail on an institution's income and expense than Schedule RI. The instructions for Schedule RI would be revised effective March 31, 2018, to indicate that, for institutions that have adopted ASU 2016-01, the amount of unrealized holding gains (losses) on equity securities not held for trading in foreign offices that is included in Schedule RI, item 8.b, should be reported in Schedule RI-D, item 5, "Realized gains (losses) on held-to-maturity and available-for-sale securities in foreign offices." Effective December 31, 2020, the caption for item 5 would be revised to "Realized gains (losses) on held-to-maturity and available-for-sale debt securities and unrealized holding gains (losses) on equity securities not held for trading in foreign offices."

(3) In Schedule RC, Balance Sheet, a new item 2.c, "Equity securities with readily determinable fair values not held for trading," would be added effective March 31, 2018. From

March 31, 2018, through September 30, 2020, the instructions for item 2.c and the reporting form for Schedule RC would include guidance stating that item 2.c is to be completed only by institutions that have adopted ASU 2016-01. Institutions that have not adopted ASU 2016-01 would leave item 2.c blank. During this period, the instructions for Schedule RC, item 2.b, "Available-for-sale securities," would explain that institutions that have adopted ASU 2016 01 should include only debt securities in item 2.b. Effective December 31, 2020, the caption for item 2.b would be revised to "Available-for-sale debt securities" and all institutions would report their holdings of equity securities with readily determinable fair values not held for trading in item 2.c.

(4) In Schedule RC-B, Securities, item 7, "Investments in mutual funds and other equity securities with readily determinable fair values," would be removed effective December 31, 2020. From March 31, 2018, through September 30, 2020, the instructions for item 7 and the reporting form for Schedule RC-B would include guidance stating that item 7 is to be completed only by institutions that have not adopted ASU 2016-01. Institutions that have adopted ASU 2016-01 would leave item 2.c blank.

(5) In Schedule RC-F, Other Assets, the caption for item 4 would be changed from "Equity securities that DO NOT have readily determinable fair values" to "Equity investments without readily determinable fair values" effective March 31, 2018. The types of equity securities and other equity investments currently reported in item 4 would continue to be reported in this item. However, after the effective date of ASU 2016-01 for an institution, the securities the institution reports in item 4 would be measured in accordance with the ASU.

(6) In Schedule RC-H, Selected Balance Sheet Items for Domestic Offices, of the FFIEC 031, item 16, "Investments in mutual funds and other equity securities with readily determinable fair values," would be removed effective December 31, 2020, and the caption for item 17 would be changed from "Total held-to-maturity and available-for-sale securities (sum of items 10 through 16)" to "Total held-to-maturity and available-for-sale debt securities (sum of items 10 through 15)." From March 31, 2018, through September 30, 2020, the instructions for item 16 and the reporting form for Schedule RC-H would include guidance stating that item 16 is to be completed only by institutions that have not adopted ASU 2016-01. Institutions that have adopted ASU 2016-01 would leave item 16 blank. In addition, effective March 31, 2018, item 18, "Equity securities that do not have readily determinable fair values," would be replaced by item 18.a, "Equity securities with readily determinable fair values," and item 18.b, "Equity investments without readily determinable fair values." From March 31, 2018, through September 30, 2020, the instructions for item 18.a and the reporting form for Schedule RC-H would include guidance stating that item 18.a is to be completed only by institutions that have adopted ASU 2016-01. Institutions that have not adopted ASU 2016-01 would leave item 18.a blank. The types of equity securities and other equity investments without readily determinable fair values that are currently reported in item 18 would be reported in item 18.b.

(7) In Schedule RC-K, Quarterly Averages, the caption for item 4, "All other securities," would be changed to "All other debt securities and equity securities with readily determinable fair values not held for trading purposes" effective March 31, 2018. From March 31, 2018, through September 30, 2020, the instructions for item 4 and the reporting form for Schedule RC-

K would include guidance indicating that, for institutions that have adopted ASU 2016-01, the quarterly average for equity securities with readily determinable fair values should be based on fair value and, for institutions that have not adopted ASU 2016-01, the quarterly average for such equity securities (i.e., AFS equity securities) should be based on historical cost. Effective December 31, 2020, this guidance would indicate that the quarterly average for equity securities with readily determinable fair values not held for trading should be based on fair value, which would apply to all institutions. In addition, for Schedule RC-K, item 9, "Total assets," the instructions for this item and the Schedule RC-K reporting form would include guidance from March 31, 2018, through September 30, 2020, stating that, for purposes of reporting the quarterly average for total assets:

- Institutions that have adopted ASU 2016-01 should reflect the quarterly average for equity securities with readily determinable fair values at fair value and the quarterly average for equity securities without readily determinable fair values at their balance sheet carrying amounts (i.e., fair value or, if elected, cost minus impairment, if any, plus or minus changes resulting from observable price changes), and
- Institutions that have not adopted ASU 2016-01 should reflect the quarterly average for equity securities with readily determinable fair values at the lower of cost or fair value and the quarterly average for equity securities without readily determinable fair values at historical cost.

Then, effective December 31, 2020, the instructions for item 9 and the Schedule RC-K reporting form would indicate that, for equity securities not held for trading, the quarterly average for total assets should reflect such securities with readily determinable fair values at fair value and those without readily determinable fair values at their balance sheet carrying amounts.

(8) In Schedule RC-Q on the FFIEC 041 and FFIEC 031, the caption for item 1, "Available-for-sale securities," would be changed to "Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading purposes" effective March 31, 2018. From March 31, 2018, through September 30, 2020, the instructions for item 1 and the reporting form for Schedule RC-Q would include guidance stating that, for institutions that have adopted ASU 2016-01, the amount reported in item 1, column A, must equal the sum of Schedule RC, items 2.b and 2.c, and for institutions that have not adopted ASU 2016-01, the amount reported in item 1, column A, must equal Schedule RC, item 2.b. Effective December 31, 2020, this guidance would indicate that the amount reported in item 1, column A, must equal the sum of Schedule RC, items 2.b and 2.c.

(9) In Schedule RC-R, Part I, Regulatory Capital Components and Ratios, the instructions for item 9.a and the Schedule RC-R reporting form would include guidance from March 31, 2018, through September 30, 2020, stating that, for institutions that have not adopted ASU 2016-01, item 9.a should include net unrealized gains (losses) on AFS debt and equity securities and, for institutions that have adopted the ASU, item 9.a should include net unrealized gains (losses) on AFS debt securities. During this same period, the instructions for item 9.b and the Schedule RC-R reporting form would include guidance indicating that item 9.b is to be completed only by institutions that have not adopted ASU 2016-01. Effective December 31, 2020, item 9.b would be removed and the caption for item 9.a would be revised to "LESS: Net unrealized gains (losses) on available-for-sale debt securities." In addition, from March 31,

2018, through September 30, 2020, the instructions for Schedule RC-R, Part I, item 31, and the Schedule RC-R reporting form would include guidance indicating that item 31 is to be completed only by institutions that have not adopted ASU 2016-01. During this period, institutions that have adopted the ASU would leave item 31 blank. Then, effective December 31, 2020, item 31 would be removed from Schedule RC-R, Part I.

(10) In Schedule RC-R, Part II, Risk-Weighted Assets, revisions would be made to item 2 that correspond to those made to Schedule RC, item 2. A new item 2.c, “Equity securities with readily determinable fair values not held for trading,” would be added to Schedule RC-R, Part II, effective March 31, 2018. Applicable risk weights for new item 2.c would be 100 percent, 250 percent, 300 percent, and 600 percent; amounts also could be reported in columns R and S. From March 31, 2018, through September 30, 2020, the instructions for item 2.c and the reporting form for Schedule RC-R, Part II, would include guidance stating that item 2.c is to be completed only by institutions that have adopted ASU 2016-01. During the same period, the instructions for Schedule RC R, Part II, item 2.b, “Available-for-sale securities,” would explain that institutions that have adopted ASU 2016-01 should include only debt securities in this item. Effective December 31, 2020, the caption for item 2.b would be revised to “Available-for-sale debt securities” and the 250 percent, 300 percent, and 600 percent risk weights plus columns R and S would be removed from item 2.b.

Time Schedule for Information Collection

The Call Reports are collected quarterly as of the end of the last calendar day of March, June, September, and December. Less frequent collection of Call Reports would reduce the Federal Reserve’s ability to identify on a timely basis those banks that are experiencing adverse changes in their condition so that appropriate corrective measures can be implemented to restore their safety and soundness. State member banks must submit the Call Reports to the appropriate Federal Reserve Bank within 30 calendar days following the as-of date; a five-day extension is available to banks with more than one foreign office.

Aggregate data are published in the *Federal Reserve Bulletin* and the *Annual Statistical Digest*. Additionally, data are used in the *Uniform Bank Performance Report (UBPR)* and the *Annual Report of the FFIEC*. Individual respondent data, excluding confidential information, are available to the public from the National Technical Information Service in Springfield, Virginia, upon request approximately twelve weeks after the report date. Data are also available from the FFIEC Central Data Repository Public Data Distribution (CDR PDD) website (https://cdr.ffiec.gov/public/). Data for the current quarter are made available, shortly after a bank’s submission, beginning the first calendar day after the report date. Updated or revised data may replace data already posted at any time thereafter.

Legal Status

The Board’s Legal Division has determined that section 9 of the Federal Reserve Act (12 U.S.C. 324) authorizes the Board to require these reports from all state member banks. The obligation to respond is mandatory. Most of the information provided on the Call Reports is publicly available. However, the following items are confidential: (1) the FDIC deposit insurance assessment information reported in response to item 2.g on Schedule RI-E, (2) the prepaid deposit insurance assessments information reported in response to item 6.f on schedule RC-F, and (3) the information regarding other data for deposit insurance and FICO assessments reported in respond to memorandum items 6-9, 14-15, and 18 on schedule RC-O. This information can be exempt from disclosure under (b)(8) of the Freedom of Information Act (FOIA) which specifically exempts from disclosure information "contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions" (5 U.S.C. 552 (b)(8)).

It is possible to reverse engineer an institution's Capital, Asset Quality, Management, Earnings, Liquidity, and Sensitivity (CAMELS) rating based on the data reported under the FDIC deposit insurance assessment data item and the prepaid deposit insurance assessments data item. Thus, if this information is publicly available, it would be possible to determine the state member bank's CAMELS rating. Public release of this information could cause substantial harm to an institution because, for example, if an institution has a poor CAMELS rating, it would likely impact the institution's pricing, overall marketplace ratings, and its ability to obtain funding. Therefore, this information can be kept confidential under section (b)(4) (5 U.S.C. 552(b)(4)). The release of information regarding other data for deposit insurance and FICO assessments reported in response to memorandum items 6-9, 14-15, and 18 on schedule RC-O would likely cause substantial harm to the competitive position of the institution from whom the information was obtained if it was released. Therefore, this information can also be kept confidential under section (b)(4) (5 U.S.C. 552(b)(4)).

Consultation Outside the Agency and Discussion of Public Comments

On June 27, 2017, the agencies, under the auspices of the FFIEC, published an initial notice in the *Federal Register* (82 FR 29147) requesting public comment for 60 days on the extension, with revision, of the Call Reports. The comment period for this notice expired on August 28, 2017. The agencies collectively received comments from 13 entities, including banking organizations, bankers' associations, and a government entity. General comments and recommendations on the FFIEC 031, FFIEC 041, and FFIEC 051 Call Reports are included in this section. The agencies provide information regarding comments on specific aspects of the proposed revisions to the Call Reports in more detail below.

Comments on the Overall Proposal and the Burden-Reduction Initiative

Commenters expressed mixed opinions on the June 2017 notice and the agencies' Call Report burden-reduction initiatives to date. Seven commenters representing banking organizations and bankers' associations supported the effort put forth by the agencies. One bankers' association stated that it "appreciates the time and effort the FFIEC has devoted to identifying opportunities to reduce the burdens associated with the Call Report requirements." The commenter went on to say that the removal or change in reporting frequency of line items or increase to reporting thresholds "serves as needed clean-up of the Call Report." Three banking organizations also "appreciate" the agencies' initiatives focused on reducing the burden associated with the Call Reports. The government entity stated it uses certain data items in the

Call Report in preparing national economic reports, and encouraged the agencies to continue collecting those items.

On the other hand, the majority of the comment letters asserted that the proposed revisions to the Call Reports would provide no real savings in effort or cost for smaller institutions and that the overall reduction in burden is of limited value to such institutions. One of the banking organizations and two of the bankers' associations further indicated that reducing reporting frequency would provide only "limited relief." These commenters noted that regardless of whether cumulative data is reported every quarter or every six months, institutions would still need to gather the data on a quarterly basis in order to produce the reported data on a semiannual basis. Two bankers' associations responded that combining data items also would not provide any relief to institutions, because processes are already in place to gather the information separately. One banking organization and one bankers' association stated that the proposed revisions would increase burden due to the system changes that would be necessary to modify the processes currently in place, such as deactivating or reactivating each quarter the reporting of data items that would change from a quarterly to a semiannual or annual reporting frequency.

The agencies recognize that not all institutions would see an immediate and large reduction in burden from the proposed revisions in the June 2017 notice. However, reducing the frequency of collection for certain data items or consolidating existing data items into fewer data items would result in institutions spending less time completing the Call Report since there would be fewer items to review prior to each quarterly submission. Also, an institution would have fewer instructions to review to determine whether it has reportable (nonzero) amounts. To the extent that an institution currently tracks granular data items that are proposed to be consolidated, there may be limited burden relief from consolidating the items. However, institutions that currently track data at an aggregate level and then must allocate that amount to the existing subcategories every quarter would see additional burden relief. Accordingly, these changes represent meaningful Call Report burden relief to institutions that do not engage in complex activities.

Furthermore, as previously mentioned, internal surveys of users of Call Report data at FFIEC member entities, including staff of the agencies, were one of the significant actions under the FFIEC's community bank Call Report burden-reduction initiative. The survey responses have been the foundation for the statutorily mandated review of the existing Call Report data items that the agencies have been conducting over the course of the burden-reduction initiative. After completing this review, the statute directs the agencies to "reduce or eliminate any requirement to file information or schedules . . . (other than information or schedules that are otherwise required by law)" if the agencies determine that "the continued collection of such information or schedules is no longer necessary or appropriate." The findings from the agencies' review revealed that certain information is no longer needed from some or all institutions, either on a quarterly basis or at all, and that the current level of detail is no longer needed from some or all institutions in certain Call Report schedules. Accordingly, for those Call Report data items for which the results of the statutorily mandated review have triggered these conclusions, the agencies are removing, consolidating, or reducing the reporting frequency of, or creating a new or increased reporting threshold for, the affected Call Report data items notwithstanding any system changes that institutions would need to make in response to these reporting changes.

Finally, in an effort to address the concerns of institutions relating to the proposed reductions in frequency from quarterly to semiannual, the agencies note that the FFIEC's Central Data Repository (CDR)[21] allows institutions to submit data quarterly, even if the data items are only required to be reported semiannually or annually. This will permit institutions to choose to avoid any perceived burden needed to reduce the reporting frequency from the quarterly frequency required in the existing Call Report.

General Recommendations from Commenters

Three commenters suggested the agencies adopt a "short-form" Call Report to be filed for at least two quarters of the year. The short-form Call Report recommended by two of these commenters would consist only of an institution's balance sheet, income statement, and statement of changes in equity capital. The institution would file a full Call Report including all supporting schedules in the second and fourth quarters, and the short-form Call Report in the first and third quarters. The third commenter recommended including a limited number of additional schedules in the first and third quarters to report more detailed information on loans and regulatory capital, with additional schedules filed in the second and fourth quarters.

While the agencies understand the commenters' desire for a short-form Call Report, the agencies did not adopt this suggestion for the reasons noted in response to the comment letters received on the August 2016 proposal for a streamlined Call Report for small institutions.[22] Most notably, in addition to the basic financial statements, the most streamlined quarterly report possible must also include data items required by law or regulation, along with quarterly data necessary for adequate supervision by the agencies. Furthermore, the agencies leverage a significant amount of the data reported quarterly in the more detailed general and supplemental Call Report schedules when conducting off-site monitoring and determining the scope and frequency of on-site examinations. Limiting the information collected on these schedules to semiannual could significantly impair the agencies' supervisory planning and review processes and potentially lead to a less efficient use of supervisory resources.

One commenter recommended that the FFIEC establish an industry advisory committee to develop advice and guidance on the Call Report and establish a regular forum to address technical questions and new changes to the Call Report. In response, the agencies plan to continue to offer outreach in connection with significant revisions to the Call Report, as they did with the adoption of the revised Schedule RC-R, Regulatory Capital, and with the implementation of the FFIEC 051. The agencies also receive and respond to a number of questions from individual institutions each quarter. Issues that could affect multiple institutions are often addressed through the Call Report Supplemental Instructions published quarterly or updates to the Call Report instruction book published as needed. Consistent with the PRA, the agencies also offer an opportunity for members of the banking industry to comment on proposed

[21] The CDR is a secure, shared application for collecting, managing, validating, and distributing data reported in the Call Report and the FDIC's annual Summary of Deposits survey (OMB No. 3064-0061). The CDR also processes and distributes the Uniform Bank Performance Report.

[22] See 82 FR 2444 (January 9, 2017).

changes to the Call Report or to make any additional suggestions for improving, streamlining, or clarifying the Call Report.

One commenter recommended that the agencies align the proposed revisions in the Call Report with revisions to the FR Y-9C report for holding companies.[23] The commenter stated that having differences in reporting between the Call Report and FR Y-9C can create burden for reporting firms. The agencies agree that aligning proposed revisions in the Call Report with proposed revisions to comparable data items collected in the consolidated FR Y-9C report would reduce burden for reporting holding companies. The Board will take this comment into consideration when it develops proposed revisions to the FR Y-9C report.

One commenter recommended that the agencies increase the asset-size threshold for filing the FFIEC 051 Call Report from the current $1 billion to at least $10 billion, indexed for inflation. Raising the threshold to $10 billion or higher at this time could result in a significant loss of data necessary for supervisory or other purposes from institutions with assets above $1 billion. Therefore, while the agencies are not adopting this recommendation at this time, the agencies are continuing to evaluate the appropriate scope and criteria for expanding the number of institutions eligible to file the FFIEC 051.

The agencies received three comment letters from banking organizations that highlighted the burden required for their institutions to prepare Schedule RC-R, Regulatory Capital. Reporting on Schedule RC-R is directly tied to the requirements in the agencies' regulatory capital rules.[24]

The agencies recently issued a proposal for modifications to simplify the regulatory capital rules.[25] To the extent changes contained in that proposal are adopted in a final rule, the agencies would incorporate those simplifications into Schedule RC-R.

One commenter stated that Schedule RC-C, Part II, is particularly burdensome to complete and should be eliminated. The agencies previously reduced the frequency of this schedule from quarterly to semiannual for institutions filing the FFIEC 051.[26] However, the agencies cannot eliminate this schedule because the submission of information on small business and small farm loans is specifically required by statute.[27] Appendix A to the agencies' January 2017 *Federal Register* notice (82 FR 2444) provides information about how the agencies use the data reported in Schedule RC-C, Part II.

Specific Comments on the Proposed Call Report Revisions

A. Scope Revision

The agencies proposed to revise the scope of the FFIEC 031 Call Report to require all

[23] Consolidated Financial Statements for Holding Companies, OMB No. 7100-0128.
[24] See 12 CFR part 3 (OCC); 12 CFR part 217 (Board); 12 CFR part 324 (FDIC).
[25] See 82 FR 49984 (October 27, 2017).
[26] See 82 FR 2444 (January 9, 2017).
[27] See section 122 of the Federal Deposit Insurance Corporation Improvement Act of 1991, Public Law 102-242.

institutions with consolidated total assets of $100 billion or more to file this form, regardless of whether an institution has any foreign offices. The agencies proposed this change because institutions with consolidated total assets of $100 billion or more without foreign offices are considered to have a similar degree of complexity in their activities as institutions of this size with foreign offices that currently file the FFIEC 031.

The agencies received two comments opposing the proposed scope revision. One bankers' association stated that the proposal could be viewed as creating three Call Reports for larger banks, which could create a problem if the reports evolve and do not remain aligned in the future. Another bankers' association opposed the agencies' use of a size-based threshold alone (i.e., $100 billion or more in assets) to revise the scope of the FFIEC 031, rather than looking at the business model and risk profile of an institution.

The agencies are proceeding with the proposed scope revision of the FFIEC 031 to include all institutions with foreign offices and all institutions with consolidated total assets of $100 billion or more. The agencies note that this revision would affect only five institutions, as the majority of institutions with assets of $100 billion or more also have foreign offices and currently file the FFIEC 031. Currently, the FFIEC 031 and FFIEC 041 collect the same information on an institution's domestic office activities. When preparing the FFIEC 031, institutions with no foreign offices would not need to report items that request information on foreign offices, including the entirety of Schedules RI-D; RC-E, Part II; and RC-I; nor would they need to complete Schedule RC-H, which collects certain domestic office data. These institutions also would report the same amounts for "domestic offices" and "consolidated bank" in other schedules that request this breakout, which would not require these institutions to compile additional information. In addition, there is currently a single set of Call Report instructions for both the FFIEC 031 and FFIEC 041, which helps promote consistency in reporting between those versions of the Call Report and should reduce the burden of a transition for the affected institutions. As noted in the June 2017 notice, the agencies consider all institutions with $100 billion or more in total assets to be of similar complexity. Institutions of this size typically have similar business activities and risk profiles for their domestic operations, and the agencies' examiners review these domestic operations in a similar manner. Receiving information from all institutions in this size category on the same Call Report form will improve the agencies' ability to perform comparisons among these institutions' domestic operations. This proposed scope revision also has enabled the agencies to propose removing items from, or consolidating a significant number of items in, the FFIEC 041 form,[28] as the agencies believe these items are no longer necessary based on the business activities and risk profiles of institutions with domestic offices only and consolidated total assets less than $100 billion.

B. Burden-Reducing Revisions

The agencies received two comments from banking organizations on the proposed revisions to Schedule RI-E to reduce the reporting frequency of the data items for significant components of "other noninterest income" and "other noninterest expense" from quarterly to annual in the FFIEC 051 and increase the percentage threshold for reporting individual components in all three versions of the Call Report. One commenter noted this revision would

[28] See 82 FR 51908 (November 8, 2017).

actually reduce burden in preparing the reports. The other commenter stated that his organization does not meet the existing thresholds to separately report noninterest income and expense components on that schedule, so the reporting burden would not change.

After considering these specific comments, as well as the comments received on the overall proposal and the burden-reduction initiative that were discussed above, the agencies will proceed with the proposed burden-reducing changes to Schedule RI-E, along with all other burden-reducing changes to Call Report schedules proposed in the June 2017 notice. The agencies recognize that not every proposed change will reduce burden for every institution. However, the agencies believe that the proposed changes will reduce burden in the Call Reports as a whole, which is also reflected in a reduction in the estimated burden hours per quarter for the Call Reports.

C. Instructional Revision for the Reporting of Assets as "Past Due"

Under the current Call Report instructions, closed-end installment loans, amortizing loans secured by real estate, and other loans and lease financing receivables with payments scheduled monthly are to be reported as past due in Schedule RC-N, Past Due and Nonaccrual Loans, Leases, and Other Assets, when the borrower is in arrears two or more monthly payments. This means that a loan is to be reported as past due if two monthly payments have not been received by the close of business on the due date of the second monthly payment. Similarly, the Call Report instructions provide that open-end credit such as credit cards, check credit, and other revolving credit plans are to be reported as past due when the customer has not made the minimum payment for two or more billing cycles. The instructions also provide that, at an institution's option, loans and leases with payments scheduled monthly may be reported as past due when one scheduled payment is due and unpaid for 30 days or more.

The agencies note there is an existing widely used industry standard, known as the Mortgage Bankers Association (MBA) method, which provides that loans with payments scheduled monthly become 30 days past due if a monthly payment is not received by the end of the day immediately preceding the loan's next due date. The agencies understand that the MBA method is used by most major mortgage data repositories, including the three major credit bureaus and two major mortgage loan data processing service bureaus used by institutions. The MBA method is also used by reporting forums such as the MBA, McDash Analytics, and the OCC Mortgage Metrics Reports.

Therefore, to promote the use of a consistent standard in the industry and reduce the burden for certain institutions calculating past-due loans under two methods (i.e., one method for Call Report purposes and a different method for other reporting purposes), the agencies proposed in the June 2017 notice to modify the definition of "past due" for regulatory reporting purposes that is currently contained in the general instructions of Schedule RC-N to align with the MBA method. Specifically, under that proposal, closed-end installment loans, amortizing loans secured by real estate, and other loans and lease financing receivables with payments scheduled monthly, as well as open-end credit such as credit cards, check credit, and other revolving credit plans with payments scheduled monthly, would be reported as past due in Schedule RC-N if a payment is not received by the end of the day immediately preceding the loan's next payment due date.

The agencies received comments from two bankers' associations and three banking organizations regarding the proposed instructional revision to the definition of "past due." These commenters generally opposed the proposed revision. All commenters cited increased burden related to operational difficulties to implement the change as well as concerns about how this definitional change would flow through to or affect other reporting requirements. Operational challenges cited by commenters include substantial processing system changes; the need to modify contracts with third-party vendors, loan securitization agreements, and other legal agreements; communication issues with loan servicing customers; and coordination issues with third-party vendors to implement the proposed revision. Other related reporting concerns include possible restatements of audited financial statements and filings with the Securities and Exchange Commission; the effect on the calculation of the allowance for loan and lease losses; the impact on the risk weighting associated with delinquent and nonaccrual loans as reported on Schedule RC-R, Regulatory Capital; the use of performing loans as inputs for stress testing and recovery and resolution planning purposes; the impact on liquidity reporting; and the impact on the calculation of surcharge scores assessed to global systemically important banks (G-SIBs). Additionally, one bankers' association stated that the proposed instructional change would remove the current reporting flexibility for institutions to use a combination of actual-day count, the MBA method, and the current Call Report method based on the institutions' particular portfolios.

Based on the issues raised in the comments received on the proposed instructional revision to the definition of past due, the agencies are giving further consideration to this proposal, including its effect on and relationship to other regulatory reporting requirements. Accordingly, the agencies are not proceeding with this proposed instructional revision and the existing instructions for the definition of past due will remain in effect.

D. Proposed Call Report Revisions to Address Changes in Accounting for Equity Investments

In January 2016, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) No. 2016-01, "Recognition and Measurement of Financial Assets and Financial Liabilities." As one of its main provisions, the ASU requires certain investments in equity securities (including other ownership interests, such as interests in partnerships, unincorporated joint ventures, and limited liability companies) to be measured at fair value with changes in fair value recognized in net income (fair value through net income).

Section 37(a) of the Federal Deposit Insurance Act (12 U.S.C. 1831n(a)) states that, in general, the accounting principles applicable to the Call Report "shall be uniform and consistent with generally accepted accounting principles." The agencies are maintaining consistency with U.S. GAAP by implementing the provisions of ASU 2016-01 in the Call Report in accordance with the effective dates set forth in the ASU. For institutions that are public business entities, as defined in U.S. GAAP, ASU 2016-01 is effective for fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. For all other institutions, the ASU is effective for fiscal years beginning after December 15, 2018, and interim periods within fiscal years beginning after December 15, 2019.

Based on their consideration of the changes in the accounting for equity investments under ASU 2016-01 and the effect of these changes on the manner in which data on equity securities and other equity investments are currently reported in the Call Report, the agencies proposed to revise the reporting of information on equity securities and other equity investments in Call Report Schedules RI, Income Statement; RI-D, Income from Foreign Offices (on the FFIEC 031); RC, Balance Sheet; RC-B, Securities; RC-F, Other Assets; RC-H, Selected Balance Sheet Items for Domestic Offices (on the FFIEC 031); RC-K, Quarterly Averages; RC-Q, Assets and Liabilities Measured at Fair Value on a Recurring Basis (on the FFIEC 041 and FFIEC 031); and RC-R, Regulatory Capital.[29]

In developing the proposed revisions to these Call Report schedules, the agencies sought to limit the number of data items being added to the Call Report to address the changes in accounting for equity securities and other equity investments.

Furthermore, because of the different effective dates for ASU 2016-01 for public business entities and all other entities, as well as the varying fiscal years across the population of institutions that file Call Reports, the period over which institutions will be implementing this ASU ranges from the first quarter of 2018 through the fourth quarter of 2020. As a result, the agencies proposed to introduce the revisions to the reporting of information on equity securities and other equity investments in response to the ASU in the Call Report effective March 31, 2018.

The agencies received comments from two banking organizations and two bankers' associations addressing the proposed Call Report revisions related to equity securities. Both bankers' associations expressed general support for the proposed changes to reporting of information on equity securities and other equity investments. However, for an institution that has adopted the new accounting standard, the associations sought clarification of the appropriate categorization on the proposed revised Call Report balance sheet (Schedule RC) of equity securities with readily determinable fair values that are bought and sold on a regular basis, but are not held with the intention of trading as this term is defined in the agencies' market risk rules.[30] The agencies note that, for purposes of categorizing assets and liabilities on the Call Report balance sheet, they do not apply the trading definition in the market risk rules. Rather, the Call Report instructions state that:

> Trading activities typically include (a) regularly underwriting or dealing in securities; interest rate, foreign exchange rate, commodity, equity, and credit derivative contracts; other financial instruments; and other assets for resale, (b) acquiring or taking positions in such items principally for the purpose of selling in the near term or otherwise with the intent to resell in order to profit from short-term price movements, and (c) acquiring or taking positions in such items as an accommodation to customers or for other trading

[29] See 82 FR 29158-29159 (June 27, 2017) for complete descriptions of the proposed revisions to these schedules.
[30] The market risk rules define a "trading position" as a position held "for the purpose of short-term resale or with the intent of benefiting from actual or expected short-term price movements, or to lock in arbitrage profits." See 12 CFR 3.202 (OCC), 12 CFR 217.202 (Board), and 12 CFR 324.202 (FDIC).

purposes.[31]

Thus, when an institution's holdings of equity securities with readily determinable fair values fall within the scope of the preceding description of trading activities, the equity securities should be reported as trading assets in Schedule RC, item 5. Otherwise, the equity securities should be reported in new item 2.c, "Equity securities with readily determinable fair values not held for trading." The agencies will modify the Call Report instructions to make this distinction more clear.

One banking organization noted that the proposal aligns the Call Report with the new accounting standard for equity investments, but it requested clarification of the balance sheet categorization of money market mutual funds following the adoption of the accounting standard. This organization observed that the Securities and Exchange Commission's rules permit such funds to be categorized as cash equivalents in financial statements filed with the Commission if appropriate criteria are met. The organization asked whether the agencies intended to permit a similar categorization for Call Report purposes. The Call Report does not recognize cash equivalents as part of "Cash and balances due from depository institutions," as described in the instructions for Schedule RC, item 1. Thus, for Call Report purposes, an institution that has adopted ASU 2016-01 should report its investments in money market mutual funds with readily determinable fair values, which are considered equity securities for accounting purposes,[32] in new Schedule RC, item 2.c, provided these investments are not held for trading (as discussed above). The agencies also will revise the Call Report instructions to clarify the reporting of money market mutual funds as equity securities, not as cash.

The other banking organization supported the proposed changes to the income statement for reporting unrealized holding gains (losses) on equity securities not held for trading, but recommended excluding unrealized gains on equity securities from tier 1 capital for regulatory capital purposes as is currently the case under today's accounting standards. The manner in which unrealized gains on equity securities are reported for regulatory capital purposes in Call Report Schedule RC-R depends entirely on how these unrealized gains are treated under the agencies' regulatory capital rules. After an institution adopts ASU 2016-01, unrealized gains on the institution's investments in equity securities with readily determinable fair values not held for trading will be recognized in net income and, hence, retained earnings. Because retained earnings is a common equity tier 1 (CET1) capital element under the agencies' regulatory capital rules, the operation of these rules will automatically result in the inclusion of all unrealized gains on such equity securities in CET1 capital after an institution's adoption of ASU 2016-01. Continuing to exclude unrealized gains on equity securities with readily determinable fair values not held for trading from CET1 capital after the adoption of ASU 2016-01 would require revisions to the agencies' regulatory capital rules and is outside the scope of the proposed equity securities reporting changes in the Call Report.

This banking organization also recommended retaining the existing regulatory framework governing investments in stock set forth in section 362.3 of the FDIC's regulations (12 CFR

[31] See the instructions for Schedule RC, item 5, "Trading assets," the General Instructions for Schedule RC-D, Trading Assets and Liabilities, and the Glossary entry for "Trading Account" in the Call Report instructions.

[32] See FASB Accounting Standards Codification paragraph 321-10-55-7.

362.3) and the related information on equity securities currently reported in Call Report Schedule RC-B, Securities. More specifically, under section 362.3(a) of the FDIC's regulations, an insured state bank may not "directly or indirectly acquire or retain as principal any equity investment of a type that is not permissible for a national bank." However, this regulation provides for the grandfathering of certain investments in equity securities by insured state banks if certain conditions are met, including approval by the FDIC. The equity investments that are authorized to be grandfathered are common and preferred stock listed on a national securities exchange and shares of an investment company registered under the Investment Company Act of 1940.[33] However, the FDIC's regulations provide that an insured state bank's aggregate investment in these authorized investments "shall in no event exceed, when made, 100 percent of the bank's tier one capital" and that "[t]he lower of the bank's cost as determined in accordance with call report instructions or the market value" of the authorized investments "shall be used to determine compliance."[34] At present, the cost basis and fair value of an insured state bank's grandfathered equity investments are included in the amounts reported in available-for-sale columns C and D, respectively, of Call Report Schedule RC-B, item 7, "Investments in mutual funds and other equity securities with readily determinable fair values." These two Schedule RC-B items currently serve as the starting point for assessing compliance with the limit on grandfathered equity investments at those insured state banks that have received FDIC approval to hold such investments. However, in their June 2017 proposal, the agencies proposed to remove item 7, columns C and D, from Schedule RC-B effective December 31, 2020. From March 31, 2018, through September 30, 2020, institutions that have adopted ASU 2016-01 would leave Schedule RC-B, item 7, columns C and D, blank.[35] The fair value of the "Investments in mutual funds and other equity securities with readily determinable fair values" that these institutions had reported in Schedule RC-B, item 7, column D, before adopting ASU 2016-01 would instead be reported in new item 2.c, "Equity securities with readily determinable fair values not held for trading," on Schedule RC, Balance Sheet. However, under the June 2017 proposal, the cost of the equity securities reported in Schedule RC-B, item 7, column C, until an institution's adoption of ASU 2016-01 would no longer be reported after the institution's adoption of this new accounting standard because the standard eliminates the existing concept of available-for-sale equity securities. Thus, the banking organization that commented on the issue of grandfathered equity investments recommended the retention of the Call Report data items used to measure compliance with the aggregate investment limit in these authorized investments.

After considering this banking organization's recommendation as well as the provisions of section 362.3(a) of the FDIC's regulations, the agencies agree that, after its adoption of ASU 2016-01, an insured state bank that has been approved to hold authorized investments should continue to report the cost of their holdings of equity securities with readily determinable fair values not held for trading, which such an institution currently reports as available-for-sale securities in column C of Schedule RC-B, item 7. The continued collection of this cost information from insured state banks with grandfathered equity investments serves a long-term regulatory purpose by aiding the supervisory staffs of the agencies that supervise these insured state banks in performing their ongoing assessments of compliance with the aggregate limit on

[33] See 12 CFR 362.3(a)(2)(iii)(A).
[34] See 12 CFR 362.3(a)(2)(iii)(C).
[35] During this period, only those institutions that have not yet adopted ASU 2016-01 would complete Schedule RC-B, item 7, columns C and D.

such investments. Accordingly, in place of Schedule RC-B, item 7, column C, which would no longer be applicable to institutions after their adoption of ASU 2016-01, and which would ultimately be removed effective December 31, 2020, the agencies would add a new item 4, "Cost of equity securities with readily determinable fair values not held for trading," to Schedule RC-M effective March 31, 2018. The new Schedule RC-M item would be completed only by insured state banks that have adopted ASU 2016-01 and have been approved to hold grandfathered equity investments. All other institutions would leave new Schedule RC-M, item 4, blank. The equity securities for which the cost would be reported in Schedule RC-M, item 4, would be the same equity securities for which institutions that have adopted ASU 2016-01 would report the fair value in new Schedule RC, item 2.c.

In addition, as previously mentioned, the agencies also received three comments from banking organizations regarding the burden associated with Schedule RC-R, Regulatory Capital, which is one of the schedules for which several revisions related to equity securities were proposed. In this regard, a proposed change to this schedule was to add a new item 2.c, "Equity securities with readily determinable fair values not held for trading," to Schedule RC-R, Part II, Risk-Weighted Assets, effective March 31, 2018. As proposed, this new item would be completed only by institutions that had adopted ASU 2016-01 and, for such institutions, Schedule RC-R, Part II, item 2.b, "Available-for-sale securities," should include only debt securities. Effective December 31, 2020, which is the quarter-end report date as of which all institutions would be required to have adopted ASU 2016-01, the caption for item 2.b would be revised to "Available-for-sale debt securities." These proposed revisions correspond to the changes the agencies proposed to make to the categories of securities reported on Schedule RC, Balance Sheet.

The commenters who addressed Schedule RC-R recommended simplifying and shortening the schedule to reduce burden. After considering the concerns expressed by commenters about the burden of Schedule RC-R in relation to the proposed revisions to this schedule for equity securities, the agencies have decided against adding a new item 2.c to Part II of Schedule RC-R. Instead, the agencies would retain the existing risk-weighting reporting process under which those equity securities with readily determinable fair values and debt securities currently categorized as available-for-sale securities are reported together in item 2.b of Schedule RC-R, Part II. To clarify the scope of item 2.b for institutions that have and have not adopted ASU 2016-01, the agencies would change the caption for item 2.b to "Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading" effective March 31, 2018.

All the other revisions to the reporting of information on equity securities and other equity investments proposed by the agencies in response to the changes in the accounting requirements for these types of assets would be implemented as proposed and would take effect beginning as of March 31, 2018.[36]

Timing

The effective date for the implementation of the revisions to the FFIEC 031, FFIEC 041,

[36] See 82 FR 29147, 29156-29159.

and FFIEC 051 to address the change in accounting for equity investments would be March 31, 2018. However, the effective date for the implementation of all other revisions described in this notice would be June 30, 2018.

The agencies originally proposed to implement the revisions proposed in the June 2017 notice, as well as those they expected to propose based on their evaluation of the responses to the third and final portion of user surveys, as of March 31, 2018. However, on November 8, 2017, the agencies proposed that the effective date for the latter set of changes would be the June 30, 2018, report date.[37] Commenters on the June 2017 and prior Call Report notices have described the burden associated with implementing frequent revisions to the Call Report. Therefore, the agencies are delaying the burden-reducing revisions in this proposal until June 30, 2018, to align with the target implementation of the burden-reducing Call Report revisions published on November 8, 2017. This way, institutions will only need to adjust their reporting processes for one combined set of revisions effective for the June 30, 2018, Call Report rather than separate sets of revisions in March and June 2018. However, ASU 2016-01 is effective for public business entities for fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. This necessitates that the proposed equity securities reporting revisions be implemented in the Call Report in the first quarter of 2018 so that institutions required to, or electing to, adopt the new accounting standard at that time are able to report in accordance with that standard in the March 31, 2018, Call Report.

When implementing the burden-reducing Call Report revisions as of the June 30, 2018, report date, institutions may provide reasonable estimates for any new or revised Call Report data item initially required to be reported as of that date for which the requested information is not readily available. In addition, as of the March 31, 2018, report date or a subsequent report date as of which an institution is required to, or early elects to, initially report in accordance with ASU 2016-01, the institution may provide reasonable estimates for any new or revised Call Report data item affected by the equity securities reporting changes for which the requested information is not readily available. The specific wording of the captions for the new or revised Call Report data items discussed in this proposal and the numbering of these data items is subject to change.

On January 8, 2018, the agencies published a final notice in the *Federal Register* (83 FR 939).

Estimate of Respondent Burden

The current annual reporting burden for the Call Report is estimated to be 177,768 hours and would decrease to 170,690 hours as shown in the following table. The average estimated hours per response for Board Call Report filers would decrease from 54.00 hours to 51.85 hours due to the proposed changes. The proposed burden-reducing revisions to the Call Reports are the result of an ongoing effort by the agencies to reduce the burden associated with their preparation and filing and achieve burden reductions by the removal or consolidation of numerous items, the raising of certain reporting thresholds, and a reduction in reporting frequency for certain items.

[37] See 82 FR 51908 (November 8, 2017).

The proposed revisions to the reporting of equity investments are consistent with changes in the accounting standards applicable to such investments.

The estimated average burden hours collectively reflect the estimates for the FFIEC 031, the FFIEC 041, and the FFIEC 051 reports. When the estimates are calculated by type of report across the agencies, the estimated average burden hours per quarter are 123.06 (FFIEC 031), 57.71 (FFIEC 041), and 39.38 (FFIEC 051). The burden hours for the currently approved reports are 128.05 (FFIEC 031), 74.88 (FFIEC 041), and 44.94 (FFIEC 051), so the revisions in this notice would represent a reduction in estimated average burden hours per quarter by 4.99 (FFIEC 031), 17.17 (FFIEC 041), and 5.56 (FFIEC 051). The estimated burden per response for the quarterly filings of the Call Report is an average that varies by agency because of differences in the composition of the institutions under each agency's supervision (e.g., size distribution of institutions, types of activities in which they are engaged, and existence of foreign offices). These reporting requirements represent 1.6 percent of the total Federal Reserve paperwork burden.

FFIEC 031, FFIEC 041, and FFIEC 051	*Number of respondents*[38]	*Annual frequency*	*Estimated average hours per response*	*Estimated annual burden hours*
Current	823	4	54.00	177,768
Proposed	823	4	51.85	170,690
Change				(7,078)

The current total annual cost to state member banks is estimated to be $9,759,463 and with the proposed revisions would decrease to $9,370,881.[39] This estimate represents costs associated with recurring salary and employee benefits, and expenses associated with software, data processing, and bank records that are not used internally for management purposes but are necessary to complete the Call Reports.

Sensitive Questions

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

[38] Of these respondents, 552 are considered small entities as defined by the Small Business Administration (i.e., entities with $550 million or less in total assets) www.sba.gov/contracting/getting-started-contractor/make-sure-you-meet-sba-size-standards/table-small-business-size-standards.

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

Estimate of Cost to the Federal Reserve System

The cost to the Federal Reserve System for collecting and processing the FFIEC 031, FFIEC 041, and FFIEC 051 is estimated to be $2,280,455 per year.

Appendix A
Summary of the FFIEC Member Entities' Uses of the Data Items in the Call Report Schedules in the Portion of the User Surveys Evaluated in the Development of This Proposal

Schedule RI-D (Income from Foreign Offices) (FFIEC 031 only)

Schedule RI-D collects data on income from foreign offices. Collectively, the data are used in country and currency risk analyses to monitor the level, trend, quality and sustainability of the income component of foreign offices. These data help support a variety of examination activities that include, but are not limited to, earnings and yield analysis, asset securitizations, core assessment, price risk, and trading. Quarterly data also improve the off-site monitoring of trading and asset management activities. Data on investment banking, advisory, brokerage, and underwriting fees and commissions are used to track the global asset management activities of institutions with foreign offices. The global presence of these activities adds to the complexity of the asset management business conducted by financial institutions and this information is continually monitored to detect potential shifts in business models. It also serves as one component of measurement of the degree of global interconnectedness and systemic risk.

Schedule RI-E (Explanations)

Schedule RI-E collects explanations for items that significantly contribute to the total amounts reported for other noninterest income and other noninterest expense. Since other noninterest income makes up almost half of total noninterest income and other noninterest expense makes up approximately 40 percent of noninterest expense on an aggregate basis for all filers of the Call Report, data on the composition of each of these income statement data items is essential to understanding what is driving the level of and changes over time in these data items at individual institutions. The stratification of the information in this schedule allows for identification of potential unusual sources of changes in earnings that affect trend analyses. This information is particularly important for identifying losses of an unusual or nonrecurring nature when an institution is in a stressed condition, which was evident during the recent financial crisis. This stratified noninterest income and expense information continues to be critical in understanding the causes of swings in an institution's profitability.

Schedule RI-E also collects descriptive information on discontinued operations, significant adjustments to the allowance for loan and lease losses (ALLL), accounting changes and error corrections, and certain capital transactions with stockholders. These data items provide the agencies and their examiners better insight on factors driving changes in net income and the ALLL (due to sources other than provisions, charge-offs, and recoveries), along with nonrecurring types of changes in institutions' equity capital.

The detailed breakdown of components of other noninterest income in excess of the Schedule RI-E reporting threshold is essential to the Consumer Financial Protection Bureau's (CFPB) understanding of the viability of institutions' offerings of consumer services regulated by the CFPB. This information provides unique insights into institutions' reliance on key revenue streams that can impact consumer access to and the availability of services. These streams include bank and credit card interchange, income and fees from automated teller machines, and institution-described components of other noninterest income. This information also helps the CFPB monitor trends in the consumer marketplace. Similarly, the detailed breakdown of other noninterest expense facilitates the CFPB's ability to conduct statutorily-required cost analyses for rulemakings and other policy endeavors.

Schedule RC-B (Securities)

Information collected on Schedule RC-B is essential for assessment of liquidity risk, market risk, interest rate risk, and credit risk. Specifically, information on held-to-maturity, available-for-sale, and pledged securities is critical for analysis of the institution's ability to manage short-term financial obligations without negatively impacting capital or income (liquidity risk), and risk of loss due to market movements (market risk). Maturity and repricing information on debt securities collected in the Memorandum items on Schedule RC-B, together with the maturity and repricing information collected in other schedules for other types of assets and liabilities, is critical for the assessment of the risk to an institution from changes in interest rates (interest rate risk), and also contributes to the evaluation of liquidity. Thus, the maturity and repricing information collected throughout the Call Report also aids in evaluating the strategies institutions take to mitigate liquidity and interest rate risks. Liquidity and interest rate risk indicators that are calculated by agency models from an institution's Call Report data and exceed specified parameters or change significantly between examinations are red flags that call for timely examiner off-site review.

In this regard, the reported amount of debt securities with a remaining maturity of one year or less is a key input into the calculation of an institution's short-term assets that, when analyzed in conjunction with non-core funding data, can indicate the extent to which the institution is relying on short-term funding to fund longer-term assets, which presents an exposure to liquidity risk. Further, liquidity risk inputs into agency models that vary by type of security provide examiners the ability to customize and apply liquidity stress tests. Extensive back testing has shown that the liquidity risk inputs for securities contain substantial forward-looking information by which to ascertain the likelihood that an institution would be able to avoid significant liquidity problems in a stressed environment.

As another example, agency models that consider both the amortized cost and fair value of held-to-maturity and available-for-sale securities reported in Schedule RC-B are used for off-site monitoring of interest rate risk to identify individual institutions that may be significantly exposed to rising interest rates. Individual types of securities from Schedule RC-B are grouped into major categories for purposes of performing duration-based analyses of potential investment portfolio depreciation for both severe and more moderate interest rate increases. The Schedule RC-B data for these groupings of securities, together with Call Report data for other types of balance sheet assets and liabilities, also serve as inputs to quarterly duration-based estimates of potential changes in fair values for the overall balance sheet in response to various forecasted interest rate changes. Outlier institutions identified by these models are the subject of prompt supervisory follow-up to address their interest rate risk exposure.

The institution's risk profile in these areas is considered during pre-examination planning to determine the appropriate scoping and staffing for examinations. For example, the quarterly reporting of the Call Report information on held-to-maturity and available-for-sale securities also aids in the identification of low-risk areas prior to on-site examinations, allowing the agencies to improve the allocation of their supervisory resources and increase the efficiency of supervisory assessments, which reduces the scope of examinations in these areas, thereby reducing regulatory burden.

Information on the amortized cost and fair value of the securities portfolio allows for measurement of depreciation/appreciation, which is important for assessing the potential impact that unrealized gains and losses may have on earnings and liquidity. Unrealized gains and losses on available-for-sale equity securities and, for certain institutions, unrealized gains and losses on available-for-sale debt securities are an integral input into regulatory capital calculations. Furthermore, because the amount of unrealized gains and losses on both held-to-maturity and available-for-sale debt securities is an indicator of risk in the debt securities portfolio, it also is a key factor in examiners' qualitative assessments of capital adequacy.

Data showing significant depreciation in specific types of securities not issued or guaranteed by the U.S. government or its agencies can signal an institution's failure to properly evaluate the existence of other-than-temporary impairments arising from credit losses and other factors. Similarly, data on year-to-date sales and transfers of held-to-maturity securities is a basis for off-site or on-site follow-up by examiners to determine whether the reasons for these transactions are acceptable under U.S. GAAP or have resulted in the tainting of this securities portfolio. In addition, the reporting of debt securities by security type is important to identify concentrations in higher risk types of investments, which may have greater liquidity and/or credit risk than other types of securities. Information on investments in securities issued by states and political subdivisions in the United States is used by many state regulatory agencies as a starting point for monitoring compliance with certain state municipal investment regulations. The amortized cost and fair value of held-to-maturity and available-for-sale debt securities, respectively, for certain types of securities as well as the fair value of all U.S. Treasury and U.S. Government agency securities are used in the risk-based premium deposit insurance pricing methodology for large institutions and highly complex institutions.

Schedule RC-D (Trading Assets and Liabilities) (FFIEC 031 and FFIEC 041 only)

Schedule RC-D collects information on trading activity from institutions with more than a limited amount of trading assets in recent quarters. Trading assets are segmented into detailed securities and loan categories. Trading liabilities separately cover liability for short positions and other trading liabilities. The schedule's Memorandum items request additional information, including the unpaid principal balance of loans and the fair value of structured financial products and asset-backed securities held for trading purposes.

The information contained in Schedule RC-D is used to assess the overall composition of the institution's trading portfolio and also provides detailed information to evaluate the liquidity, credit, and interest rate risk within the trading portfolio, which impacts the overall risk profile of the institution. Data on the types of trading assets held by an institution – such as U.S. Treasury securities versus structured financial products versus commercial and industrial loans, for example – serve as a barometer of the relative levels of these risks in the trading portfolio. Regarding liquidity risk, the higher the level of more liquid assets an institution has within its trading portfolio, the more financial flexibility it has if faced with uncertainties or unfavorable market conditions. If an institution has a low level of liquid assets within its trading portfolio, this impacts its ability to rapidly adjust its holdings in response to adverse market movements. Information on the volume and composition of trading assets and how it has changed over recent quarters also can provide insight into an institution's trading strategies and its views on market trends. The assessment of trading portfolio composition and risks enters into pre-examination planning to determine the appropriate scoping and staffing for examinations of institutions engaged in trading activities.

Furthermore, data on securities and loans held for trading are combined with data on securities and loans held for investment, as reported in Schedule RC-B and Schedule RC-C, Part I, to benchmark weekly loan and security data collected by the Board from a sample of both small and large institutions. These weekly data are used to estimate weekly measures of extension of credit for the banking sector as a whole to provide a more timely input for purposes of monitoring the macroeconomy.

Information on mortgage-backed securities and mortgage loans held for trading assisted the CFPB's efforts to develop required estimates for various Title XIV mortgage reform rulemakings under the Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub. L. 111-203). Going forward, data items from this schedule and Schedules RC-B and RC-C, Part I, are critical for continuous monitoring of the mortgage market. The CFPB uses these items to understand the intricacies of the mortgage market that are essential to assessing institutional participation in regulated consumer financial services markets and to assess regulatory impact associated with recent and proposed policies, as required by that agency's statutory mandate.

Schedule RC-K (Quarterly Averages)

Average quarterly asset and liability information is essential to the ability of the FFIEC member entities to more appropriately evaluate the performance of individual institutions. Quarterly average data from Schedule RC-K also provide important information at the industry level for policy review at FFIEC member entities.

The average data reported in Schedule RC-K are used in conjunction with income and expense information from Schedule RI to calculate yields and costs for the corresponding categories of assets and liabilities. These ratios are presented in the Uniform Bank Performance Report (UBPR) where they are used as a tool by examiners, both on- and off-site, to monitor and evaluate trends related to an institution's earnings and capital. These ratios also help the agencies identify trends across the banking industry. Important ratios derived from quarterly average data include, but are not limited to, earnings ratios (e.g., return on average assets, overhead ratio, and net interest margin) and the leverage capital ratio.

The granularity of the data in Schedule RC-K assists in analyzing performance within a bank's asset and liability portfolios. Quarterly average balances allow for better analyses of trends in the composition of an institution's assets and liabilities than is possible from comparisons of quarter-end data, which may be affected by fluctuations related to seasonality or abnormal levels of activity at period-end. The detailed average data used to calculate the yield on specific types of interest-earning assets helps examination teams understand the impact of credit quality on the earnings performance of particular loan portfolios. Where an institution's yields on particular types of loans exceed those of its peers, this warrants examiner scrutiny to determine whether this outcome is a result of the institution's origination or purchase of lower credit quality loans. In addition, the data on the cost of funds by funding type is important in assessing the funding mix at the institution level for oversight purposes. Higher costs for particular types of deposits or other liabilities compared to these costs at an institution's peers also warrants examiner review to determine whether the institution is making greater use of more volatile non-core funding sources. The yield on interest-earning assets and cost of funds also gives insight into the effectiveness of an institution's plans and initiatives related to asset/liability mix, liquidity, and interest rate risk strategies and their resulting impact on earnings. These performance ratios are essential to the consideration of an institution's earnings during pre-examination planning to determine the appropriate scoping of this area, particularly because earnings is evaluated and rated as part of the CAMELS rating system.[40]

Schedule RC-L (Derivatives and Off-Balance-Sheet Items)

Schedule RC-L provides data on off-balance sheet assets and liabilities as well as derivatives contracts. The quarterly reporting of all off-balance sheet items in the Call Report is required by law (12 USC 1831n(a)(3)(C)). The most recent financial crisis emphasized the importance of identifying and monitoring significant exposures arising from any contingent or off-balance sheet liabilities and the effect of these exposures on an institution's overall risk profile. The granular data on components of off-balance sheet items, as well as derivatives data, assist the banking agencies in ensuring the safety and soundness of financial institutions through both off-site and on-site monitoring of a variety of potential risks. These risks include, but are not limited to, liquidity risk, credit risk, interest rate risk, and foreign exchange risk. The data on Schedule RC-L also is essential for the examination scoping process, which begins during pre-examination planning. The data offer insight into outliers and exceptions, which provide information to examiners on areas on which to focus during their on-site examinations.

The data on Schedule RC-L on the FFIEC 031 and FFIEC 041 are useful in determining an institution's potential exposure to losses from derivatives activities. It is also useful in identifying the extent to which an institution may be engaging in hedging strategies that will affect its future earnings prospects. An excessive and/or inappropriate credit derivative position could have a substantial and immediate detrimental impact to an institution's liquidity, interest rate risk, earnings, or capital adequacy. For institutions with material volumes of derivatives as reported on Schedule RC-L, examiners can assess whether the institution's management has the appropriate expertise and policies in place to manage and control the risks associated with its derivatives activities and whether the institution's capital levels are commensurate with its risk exposure. This is particularly true with respect to interest rate derivatives, which are the most widely held derivatives, and are commonly used in the management of interest rate risk.

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[40] CAMELS is an acronym that represents the ratings from six essential components of an institution's financial condition and operations: capital adequacy, asset quality, management, earnings, liquidity, and sensitivity to market risk. These components represent the primary areas evaluated by examiners during examinations of institutions.

Schedule RC-L provides a granular perspective about the types of interest rate contracts an institution has entered into, which helps an examiner focus on assessing how effectively management uses the various types of interest rate contracts in its derivatives portfolio to hedge its exposure to interest rate risk. Also, examiners investigate fluctuations in the fair values of an institution's holdings of derivatives to determine if there are changes in the institution's risk appetite as set by the board of directors and implemented by management.

The unused commitments information on Schedule RC-L is essential to examiners, especially during periods of financial distress when borrowers rely increasingly on drawing down their lines of credit and unused commitments as a source of funding. The unused commitments data enable examiners to identify whether growth in unused commitments over time is at a manageable level and permit assessments of the potential impact, if such commitments are funded, on the credit quality of the related loan categories, as well as on the liquidity and on the capital position of an institution. Also, institutions may have a concentration in a particular loan category, which may not be readily apparent from balance sheet data until unused commitments to borrowers in this category are actually funded, which dictates that examiners consider the reported amounts on unused commitments by loan category to ensure they identify and assess the concentration risk. Financial and performance standby letters of credit also present liquidity and credit risk considerations for examiners, which also may be greater during periods of financial distress when the counterparties may be more likely to fail to perform as required under the terms of the underlying contract.

The derivatives information on Schedule RC-L is also one of the primary sources that feeds into a derivatives quarterly report that is used to report on bank trading and derivatives activities. This public report issued by the OCC helps the banking agencies' on-site examiners at the largest banks to continuously evaluate the credit, market, operational, reputation, and compliance risks of bank derivatives activities.

Schedule RC-M (Memoranda)

Schedule RC-M collects various types of information. Section 7(k) of the Federal Deposit Insurance Act (12 U.S.C. 1817(k)) authorizes the federal banking agencies to require the reporting and public disclosure of information concerning extensions of credit by an institution to its executive officers and principal shareholders and their related interests. The Board's Regulation O (12 CFR 215), which has been made applicable to all institutions, imposes an aggregate lending limit on extensions of credit to insiders (executive officers, directors, principal shareholders, and their related interests) and, in general, requires an institution to make available the names of its executive officers and principal shareholders to whom the institution had outstanding as of the end of the latest previous quarter aggregate extensions of credit that, when aggregated with all other outstanding extensions of credit to such person and their related interests, equaled or exceeded the lesser of 5 percent of capital and unimpaired surplus or $500,000. The data collected in Schedule RC-M on extensions of credit to the reporting institution's insiders generally align with these requirements and assist the agencies in monitoring compliance with the insider lending regulations between examinations and determining whether supervisory follow-up is warranted when material increases in insider lending are identified.

Because identifiable intangible assets are deducted from regulatory capital or are subject to regulatory capital limits and deducted amounts are not risk weighted, the reporting of these amounts aids in validating an institution's regulatory capital calculations in Schedule RC-R. In addition to their treatment under the regulatory capital rules, mortgage servicing assets in particular are complex in nature and present liquidity risk and interest rate risk and their value is affected by the credit risk of the underlying serviced assets. Mortgage servicing assets also contribute to the level of an institution's mortgage prepayment exposure. When the level of this exposure rises above a specified benchmark at an individual institution, this exposure may warrant additional attention by examiners between examinations and necessitate greater scrutiny of management's prepayment assumptions in its own interest rate risk model during examinations or visitations.

The components of other real estate owned are needed to monitor asset quality trends at individual institutions and industry-wide, including when coupled with the past due and nonaccrual data for loans secured by the same type of property from Schedule RC-N. The component information may provide insight into the market conditions affecting the segments of the real estate market in the institution's trade area, including possible deteriorating conditions.

Maturity and repricing information on other borrowed money, together with the maturity and repricing information collected in other schedules for other types of assets and liabilities, is needed to evaluate liquidity and interest rate risk to the institution, and to aid in evaluating the strategies institutions take to mitigate these risks. Liquidity and interest rate risk indicators that are calculated by agency models from an institution's Call Report data and exceed specified parameters or change significantly between examinations are red flags that call for timely examiner attention. Data on certain secured liabilities also are used in the assessment of institutions' liquidity positions. Increases in the relative volume of secured versus unsecured liabilities may signal that an institution is encountering difficulties in rolling over unsecured borrowings due to deterioration in its condition, which would call for supervisory follow-up when identified between examinations

Information on mutual funds and annuities, bank websites with transactional capability, certain trustee and custodial activities, and captive insurance subsidiaries, is used to identify institutions engaged in these activities, some of which are not typical activities for community banks. If an institution begins to report that it engages in one or more of these activities or reports a significant increase in assets tied to an activity between examinations, this may indicate the need for examiner follow-up to assess the institution's expertise and management of these activities. An institution's involvement in these activities may also affect the staffing and scoping of examinations, particularly for activities for which compliance with applicable laws and regulations must be evaluated during examinations. The reporting of an institution's internet websites and trade names supports the FDIC's ability to serve as an information resource for insured institutions by responding to inquiries from the public with the most current information concerning the insured status of the institution behind an internet website or a physical branch office that uses a trade name.

For Qualified Thrift Lenders (QTL) subject to 12 U.S.C. 1467a(c), reporting of QTL test information assists the agencies in timely identifying thrift institutions that need to take action to remain in compliance, or that fail to comply and become subject to certain restrictions. International remittance transfers data by type are needed annually to monitor compliance with regulatory requirements (12 CFR 1005.30, et seq.). Different types of transfers pose different consumer protection concerns and information of transfer activity aids in the monitoring of the evolution of this market, and how institutions diversify remittance offerings beyond wire transfers.

Schedule RC-R (Regulatory Capital)

Schedule RC-R collects information about an institution's capital. Part I (Regulatory Capital Components and Ratios) collects information about the types and amounts of capital instruments and the leverage and risk-based capital ratios. Part II (Risk-Weighted Assets) collects additional information about types of assets on an institution's balance sheet and certain off-balance sheet items to use in computing the risk-based capital ratios.

Each federal banking agency is required to establish a leverage limit and risk-based capital requirement for insured depository institutions under 12 U.S.C. 1831o and to monitor compliance with those requirements. The agencies implemented the capital requirements in their regulatory capital rules (12 CFR part 3 for OCC; 12 CFR part 217 for the Board; 12 CFR part 324 for the FDIC) and the compliance requirements in their prompt corrective action rules (12 CFR part 6 for OCC; 12 CFR part 208, Subpart D for the Board; 12 CFR 324, Subpart H for the FDIC). The capital rules recognize three types of capital instruments: CET-1, Additional Tier 1, and Tier 2 capital. The total of each type on Schedule RC-R, Part I, includes all potential adjustments to each component as allowed under the capital rules. The capital rules also provide for a calculation of risk-weighted assets, which consists of assigning a risk-weight to every asset on an institution's balance sheet that is not deducted from capital, as well as to certain off-balance sheet items. Schedule RC-R, Part II, includes all of the fields necessary to properly calculate an institution's risk-weighted asset amount. Finally, the results of the calculation of capital instrument amounts and risk-weighted assets are used to calculate risk-based and leverage capital ratios on Schedule RC-R, Part I. The agencies need to be able to monitor compliance with the capital rules and prompt corrective action provisions no less frequently than quarterly.

In addition to using the resulting capital ratios to determine an institution's status under 12 U.S.C. 1831o and the banking agencies' prompt corrective action regulations, the FFIEC member entities use the regulatory capital information for other purposes. The calculation of Tier 1 capital at quarter-end flows into the amount of average tangible equity for the calendar quarter that institutions report in Schedule RC-O, which is used in the measurement of institutions' assessment bases for deposit insurance purposes. The Tier 1 leverage ratio is one of the inputs into the calculation of deposit insurance assessment rates for small institutions and Tier 1 capital is a commonly used input when calculating these rates for large and highly complex institutions. Capital adequacy is rated in an institution's on-site examination as the C of the CAMELS component ratings, and the information provided on Schedule RC-R helps examiners evaluate and rate that component. It is also used in the off-site monitoring process, and is important in reviewing the risk profile and viability of a financial institution. For example, the ratio of risk-weighted assets to unweighted assets has been found to provide an informative forward-looking signal regarding an institution's risk posture. The information provided on Schedule RC-R also is used in deciding whether to approve an 18-month examination cycle for a specific institution and in reviewing merger applications.

Information on specific sub-components of regulatory capital is useful as well. For example, the amounts of unrealized gains and losses on securities that flow into regulatory capital provide an indication of an institution's interest rate and market risk. Information on the risk weighting of assets and off-balance sheet items provides insight into management's risk tolerance and the institution's risk to the deposit insurance fund. The risk-weighted asset composition information and risk-based capital ratios that flow into the UBPR are helpful to examiners when reviewing Reports of Examination and to establish a peer group average for comparison when evaluating changes in these items. The risk-weighted asset composition information also assists examiners in evaluating the reasons for changes in total risk-weighted assets over time at individual institutions. The derivatives exposure items reported in the Memoranda section of Schedule RC-R, Part II, provide a key insight into the notional principal amounts of both cleared and over-the-counter derivatives in the banking system, in addition to being inputs into the calculation for risk-weighted assets.

Appendix B

FFIEC 051: To be completed by banks with domestic offices only and total assets less than $1 billion

Data Items Removed, Other Impacts to Data Items, Data Items with a Reduction in Frequency of Collection, or Data Items with an Increase in Reporting Threshold

Data Items Removed

Schedule	Item	Item Name	MDRM Number
RI	5.d.(1)	Fees and commissions from securities brokerage	RIADC886
RI	5.d.(2)	Investment banking, advisory, and underwriting fees and commissions Note: Items 5.d.(1) and 5.d.(2) of Schedule RI will be combined into one data item.	RIADC888
RI	5.d.(3)	Fees and commissions from annuity sales	RIADC887
RI	5.d.(4)	Underwriting income from insurance and reinsurance activities	RIADC386
RI	5.d.(5)	Income from other insurance activities Note: Items 5.d.(3), 5.d.(4), and 5.d.(5) of Schedule RI will be combined into one data item.	RIADC387
RI	5.g	Net securitization income	RIADB493
RI	M1	Interest expense incurred to carry tax-exempt securities, loans, and leases acquired after August 7, 1986, that is not deductible for federal income tax purposes	RIAD4513
RI-B, Part II	M4	Amount of allowance for post-acquisition credit losses on purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3)	RIADC781
RI-E	1.f	Net change in the fair values of financial instruments accounted for under a fair value option	RIADF229
RI-E	1.h	Gains on bargain purchases	RIADJ447
RC	10.a	Goodwill Note: Schedule RC, item 10.a will be moved to Schedule RC-M, new item 2.b.	RCON3163

Schedule	Item	Item Name	MDRM Number
RC	10.b	Other intangible assets (from Schedule RC-M) Note: Items 10.a and 10.b of Schedule RC will be combined into one data item.	RCON0426
RC-B	2.a	U.S. Government agency obligations (exclude mortgage-backed securities): Issued by U.S. Government agencies (Columns A through D)	RCON1289, RCON1290, RCON1291, RCON1293
RC-B	2.b	U.S. Government agency obligations (exclude mortgage-backed securities): Issued by U.S. Government-sponsored agencies (Columns A through D) Note: Items 2.a and 2.b of Schedule RC-B will be combined into one data item (Columns A through D).	RCON1294, RCON1295, RCON1297, RCON1298
RC-B	5.b.(1)	Structured financial products: Cash (Columns A through D)	RCONG336, RCONG337, RCONG338, RCONG339
RC-B	5.b.(2)	Structured financial products: Synthetic (Columns A through D)	RCONG340, RCONG341, RCONG342, RCONG343
RC-B	5.b.(3)	Structured financial products: Hybrid (Columns A through D) Note: Items 5.b.(1), 5.b.(2), and 5.b.(3) of Schedule RC-B will be combined into one line item (Columns A through D).	RCONG344, RCONG345, RCONG346, RCONG347
RC-B	M6.a	Structured financial products by underlying collateral or reference assets: Trust preferred securities issued by financial institutions (Columns A through D)	RCONG348, RCONG349, RCONG350, RCONG351
RC-B	M6.b	Structured financial products by underlying collateral or reference assets: Trust preferred securities issued by real estate investment trusts (Columns A through D)	RCONG352, RCONG353, RCONG354, RCONG355
RC-B	M6.c	Structured financial products by underlying collateral or reference assets: Corporate and similar loans (Columns A through D)	RCONG356, RCONG357, RCONG358, RCONG359
RC-B	M6.d	Structured financial products by underlying collateral or reference assets: 1–4 family	RCONG360, RCONG361,

Schedule	Item	Item Name	MDRM Number
		residential MBS issued or guaranteed by U.S. Government-sponsored enterprises (GSEs) (Columns A through D)	RCONG362, RCONG363
RC-B	M6.e	Structured financial products by underlying collateral or reference assets: 1–4 family residential MBS not issued or guaranteed by GSEs (Columns A through D)	RCONG364, RCONG365, RCONG366, RCONG367
RC-B	M6.f	Structured financial products by underlying collateral or reference assets: Diversified (mixed) pools of structured financial products (Columns A through D)	RCONG368, RCONG369, RCONG370, RCONG371
RC-B	M6.g	Structured financial products by underlying collateral or reference assets: Other collateral or reference assets (Columns A through D)	RCONG372, RCONG373, RCONG374, RCONG375
RC-K	7	Trading assets	RCON3401
RC-L	1.b.(1)	Unused consumer credit card lines	RCONJ455
RC-L	1.b.(2)	Other unused credit card lines	RCONJ456
RC-L	1.d	Unused commitments: Securities underwriting	RCON3817
RC-M	2.b	Purchased credit card relationships and nonmortgage servicing assets Note: Amounts reported in item 2.b will be included in item 2.c, All other identifiable intangible assets.	RCONB026
RC-M	3.f	Foreclosed properties from "GNMA loans" Note: Amounts reported in item 3.f will be included in item 3.c, Other real estate owned: 1—4 family residential properties.	RCONC979

Other Impacts to Data Items

Schedule	Item	Item Name	MDRM Number
RI	5.d.(1) (New)	Fees and commissions from securities brokerage, investment banking, advisory, and underwriting activities Note: Items 5.d.(1) and 5.d.(2) of Schedule RI removed above will be combined into this data item.	To be determined (TBD)
RI	5.d.(2)	Income from insurance activities (includes	TBD

	(New)	underwriting income from insurance and reinsurance activities) Note: Items 5.d.(3), 5.d.(4), and 5.d.(5) of Schedule RI removed above will be combined into this data item.	
RC	10 (New)	Intangible assets (from Schedule RC-M) Note: Items 10.a and 10.b of Schedule RC removed above will be combined into this data item.	RCON2143
RC-B	2 (New)	U.S. Government agency and sponsored agency obligations (exclude mortgage-backed securities (Columns A through D) Note: Items 2.a and 2.b of Schedule RC-B removed above will be combined into this data item (Columns A through D).	TBD (4 MDRMs)
RC-B	5.b (New)	Structured financial products (Columns A through D) Note: Items 5.b.(1), 5.b.(2), and 5.b.(3) of Schedule RC-B removed above will be combined into this line item (Columns A through D).	TBD (4 MDRMs)
RC-M	2.b (Re-mapping)	Goodwill Note: Schedule RC, item 10.a will be moved to Schedule RC-M, new item 2.b., and the phrase “other than goodwill” will be removed from the caption for Schedule RC-M, item 2.	RCON3163

Data Items with a Reduction in Frequency of Collection

Semiannual Reporting (June 30 and December 31)

Schedule	Item	Item Name	MDRM Number
RC-B	M3	Amortized cost of held-to-maturity securities sold or transferred to available-for-sale or trading securities during the calendar year-to-date	RCON1778
RC-C, Part I	M7.a	Purchased credit-impaired loans held for investment accounted for in accordance with FASB ASC 310-30: Outstanding balance	RCONC779
RC-C, Part I	M7.b	Purchased credit-impaired loans held for investment accounted for in accordance with FASB ASC 310-30: Amount included in Schedule RC-C, Part I, items 1 through 9	RCONC780
RC-C, Part I	M8.a	Total amount of closed-end loans with negative amortization features secured by 1–4 family residential properties	RCONF230
RC-C, Part I	M12	Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year (Columns A through C)	RCONGW45, RCONGW46, RCONGW47
RC-L	11.a	Year-to-date merchant credit card sales volume: Sales for which the reporting bank is the acquiring bank	RCONC223
RC-L	11.b	Year-to-date merchant credit card sales volume: Sales for which the reporting bank is the agent bank with risk	RCONC224
RC-N	M7	Additions to nonaccrual assets during the quarter Note: This caption would be revised to "Additions to nonaccrual assets during the last 6 months."	RCONC410
RC-N	M8	Nonaccrual assets sold during the quarter Note: This caption would be revised to "Nonaccrual assets sold during the last 6 months."	RCONC411
RC-N	M9.a	Purchased credit-impaired loans accounted	RCONL183,

Schedule	Item	Item Name	MDRM Number
		for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3): Outstanding balance (Columns A through C)	RCONL184, RCONL185
RC-N	M9.b	Purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3): Amount included in Schedule RC-N, items 1 through 7, above (Columns A through C)	RCONL186, RCONL187, RCONL188

Annual Reporting (December 31)

Schedule	Item	Item Name	MDRM Number
RI-E	1.a through 1.l	Other noninterest income (from Schedule RI, item 5.l)	RIADC013, RIADC014, RIADC016, RIAD4042, RIADC015, RIADF555, RIADT047, RIAD4461, RIAD4462, RIAD4463
RI-E	2.a through 2.p	Other noninterest expense (from Schedule RI, item 7.d)	RIADC017, RIAD0497, RIAD4136, RIADC018, RIAD8403, RIAD4141, RIAD4146, RIADF556, RIADF557, RIADF558, RIADF559, RIADY923, RIADY924, RIAD4464, RIAD4467, RIAD4468

Data Items with an Increase in Reporting Threshold

To be completed by banks with components of other noninterest income in amounts greater than $100,000 that exceed 7 percent of Schedule RI, item 5.l

Schedule	Item	Item Name	MDRM Number
RI-E	1.a through 1.l	Other noninterest income (from Schedule RI, item 5.l)	RIADC013, RIADC014, RIADC016, RIAD4042, RIADC015, RIADF555, RIADT047, RIAD4461, RIAD4462, RIAD4463

To be completed by banks with components of other noninterest expense in amounts greater than $100,000 that exceed 7 percent of Schedule RI, item 7.d

Schedule	Item	Item Name	MDRM Number
RI-E	2.a through 2.p	Other noninterest expense (from Schedule RI, item 7.d)	RIADC017, RIAD0497, RIAD4136, RIADC018, RIAD8403, RIAD4141, RIAD4146, RIADF556, RIADF557, RIADF558, RIADF559, RIADY923, RIADY924, RIAD4464, RIAD4467, RIAD4468

Appendix C

FFIEC 041: To be completed by banks with domestic offices only and consolidated total assets less than $100 billion

Data Items Removed, Other Impacts to Data Items, Data Items with a Reduction in Frequency of Collection, or Data Items with an Increase in Reporting Threshold

Data Items Removed

Schedule	Item	Item Name	MDRM Number
RI	M8.a	Trading revenue from interest rate exposures	RIAD8757
RI	M8.b	Trading revenue from foreign exchange exposures	RIAD8758
RI	M8.c	Trading revenue from equity security and index exposures	RIAD8759
RI	M8.d	Trading revenue from commodity and other exposures	RIAD8760
RI	M8.e	Trading revenue from credit exposures	RIADF186
RI	M8.f.(1)	Impact on trading revenue of changes in the creditworthiness of the bank’s derivatives counterparties on the bank’s derivative assets: Gross credit valuation adjustment (CVA)	RIADFT36
RI	M8.f.(2)	Impact on trading revenue of changes in the creditworthiness of the bank’s derivatives counterparties on the bank’s derivative assets: CVA hedge	RIADFT37
RI	M8.g.(1)	Impact on trading revenue of changes in the creditworthiness of the bank on the bank’s derivative liabilities: Gross debit valuation adjustment (DVA)	RIADFT38
RI	M8.g.(2)	Impact on trading revenue of changes in the creditworthiness of the bank on the bank’s derivative liabilities: DVA hedge	RIADFT39
RI	M8.h	Gross trading revenue before including positive or negative net	RIADFT40

Schedule	Item	Item Name	MDRM Number
		CVA and net DVA	
RI-E	1.f	Net change in the fair values of financial instruments accounted for under a fair value option	RIADF229
RI-E	1.h	Gains on bargain purchases	RIADJ447
RC	10.a	Goodwill Note: Schedule RC, item 10.a will be moved to Schedule RC-M, new item 2.b.	RCON3163
RC	10.b	Other intangible assets (from Schedule RC-M) Note: Items 10.a and 10.b of Schedule RC will be combined into one data item.	RCON0426
RC-B	2.a	U.S. Government agency obligations (exclude mortgage-backed securities): Issued by U.S. Government agencies (Columns A through D)	RCON1289, RCON1290, RCON1291, RCON1293
RC-B	2.b	U.S. Government agency obligations (exclude mortgage-backed securities): Issued by U.S. Government-sponsored agencies (Columns A through D) Note: Items 2.a and 2.b of Schedule RC-B will be combined into one data item (Columns A through D).	RCON1294, RCON1295, RCON1297, RCON1298
RC-B	5.b.(1)	Structured financial products: Cash (Columns A through D)	RCONG336, RCONG337, RCONG338, RCONG339
RC-B	5.b.(2)	Structured financial products: Synthetic (Columns A through D)	RCONG340, RCONG341, RCONG342, RCONG343
RC-B	5.b.(3)	Structured financial products: Hybrid (Columns A through D) Note: Items 5.b.(1), 5.b.(2), and 5.b.(3) of Schedule RC-B will be combined into one data item.	RCONG344, RCONG345, RCONG346, RCONG347

Schedule	Item	Item Name	MDRM Number
RC-D	5.a.(1)	Structured financial products: Cash	RCONG383
RC-D	5.a.(2)	Structured financial products: Synthetic	RCONG384
RC-D	5.a.(3)	Structured financial products: Hybrid Note: Items 5.a.(1), 5.a.(2), and 5.a.(3) of Schedule RC-D will be combined into one data item.	RCONG385
RC-D	6.a.(1)	Construction, land development, and other land loans	RCONF604
RC-D	6.a.(2)	Loans secured by farmland	RCONF605
RC-D	6.a.(3)(a)	Revolving, open-end loans secured by 1–4 family residential properties and extended under lines of credit	RCONF606
RC-D	6.a.(3)(b)(1)	Closed-end loans secured by 1–4 family residential properties: Secured by first liens	RCONF607
RC-D	6.a.(3)(b)(2)	Closed-end loans secured by 1–4 family residential properties: Secured by junior liens	RCONF611
RC-D	6.a.(4)	Loans secured by multifamily (5 or more) residential properties	RCONF612
RC-D	6.a.(5)	Loans secured by nonfarm nonresidential properties Note: Items 6.a.(1), 6.a.(2), 6.a.(3)(a), 6.a.(3)(b)(1), 6.a.(3)(b)(2), 6.a.(4), and 6.a.(5) of Schedule RC-D will be replaced by two data items: (1) Loans secured by 1—4 family residential properties, and (2) All other loans secured by real estate.	RCONF613
RC-D	6.c.(1)	Loans to individuals for household, family, and other personal expenditures: Credit cards	RCONF615
RC-D	6.c.(2)	Loans to individuals for household, family, and other personal expenditures: Other revolving credit plans	RCONF616
RC-D	6.c.(3)	Loans to individuals for household, family, and other personal expenditures: Automobile loans	RCONK199

Schedule	Item	Item Name	MDRM Number
RC-D	6.c.(4)	Loans to individuals for household, family, and other personal expenditures: Other consumer loans Note: Items 6.c.(1), 6.c.(2), 6.c.(3), and 6.c.(4) of Schedule RC-D will be combined into one data item.	RCONK210
RC-D	M1.a.(1)	Unpaid principal balance of loans measured at fair value: Construction, land development, and other land loans	RCONF625
RC-D	M1.a.(2)	Unpaid principal balance of loans measured at fair value: Loans secured by farmland	RCONF626
RC-D	M1.a.(3)(a)	Unpaid principal balance of loans measured at fair value: Revolving, open-end loans secured by 1–4 family residential properties and extended under lines of credit	RCONF627
RC-D	M1.a.(3)(b)(1)	Unpaid principal balance of loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by first liens	RCONF628
RC-D	M1.a.(3)(b)(2)	Unpaid principal balance of loans measured at fair value: Closed-end loans secured by 1–4 family residential properties: Secured by junior liens	RCONF629
RC-D	M1.a.(4)	Unpaid principal balance of loans measured at fair value: Loans secured by multifamily (5 or more) residential properties	RCONF630
RC-D	M1.a.(5)	Unpaid principal balance of loans measured at fair value: Loans secured by nonfarm nonresidential properties Note: Items M1.a.(1), M1.a.(2), M1.a.(3)(a), M1.a.(3)(b)(1), M1.a.(3)(b)(2), M1.a.(4), and M1.a.(5) of Schedule RC-D will be replaced by two data items: (1) Unpaid principal balance of loans measured at fair value: Loans	RCONF631

Schedule	Item	Item Name	MDRM Number
		secured by 1—4 family residential properties, and (2) Unpaid principal balance of loans measured at fair value: All other loans secured by real estate.	
RC-D	M1.c.(1)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures: Credit cards	RCONF633
RC-D	M1.c.(2)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures: Other revolving credit plans	RCONF634
RC-D	M1.c.(3)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures: Automobile loans	RCONK200
RC-D	M1.c.(4)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures: Other consumer loans Note: Items M1.c.(1), M1.c.(2), M1.c.(3), and M1.c.(4) of Schedule RC-D will be combined into one data item.	RCONK211
RC-D	M2.a	Loans measured at fair value that are past due 90 days or more: Fair value	RCONF639
RC-D	M2.b	Loans measured at fair value that are past due 90 days or more: Unpaid principal balance	RCONF640
RC-D	M3.a	Structured financial products by underlying collateral or reference assets: Trust preferred securities issued by financial institutions	RCONG299
RC-D	M3.b	Structured financial products by underlying collateral or reference assets: Trust preferred securities issued by real estate investment trusts	RCONG332
RC-D	M3.c	Structured financial products by	RCONG333

Schedule	Item	Item Name	MDRM Number
		underlying collateral or reference assets: Corporate and similar loans	
RC-D	M3.d	Structured financial products by underlying collateral or reference assets: 1–4 family residential MBS issued or guaranteed by U.S. Government-sponsored enterprises (GSEs)	RCONG334
RC-D	M3.e	Structured financial products by underlying collateral or reference assets: 1–4 family residential MBS not issued or guaranteed by GSEs	RCONG335
RC-D	M3.f	Structured financial products by underlying collateral or reference assets: Diversified (mixed) pools of structured financial products	RCONG651
RC-D	M3.g	Structured financial products by underlying collateral or reference assets: Other collateral or reference assets	RCONG652
RC-D	M4.a	Pledged trading assets: Pledged securities	RCONG387
RC-D	M4.b	Pledged trading assets: Pledged loans	RCONG388
RC-D	M5.a	Asset-backed securities: Credit card receivables	RCONF643
RC-D	M5.b	Asset-backed securities: Home equity lines	RCONF644
RC-D	M5.c	Asset-backed securities: Automobile loans	RCONF645
RC-D	M5.d	Asset-backed securities: Other consumer loans	RCONF646
RC-D	M5.e	Asset-backed securities: Commercial and industrial loans	RCONF647
RC-D	M5.f	Asset-backed securities: Other	RCONF648
RC-D	M6	Retained beneficial interests in securitizations	RCONF651
RC-D	M7.a	Equity securities: Readily determinable fair values	RCONF652
RC-D	M7.b	Equity securities: Other	RCONF653
RC-D	M8	Loans pending securitization	RCONF654
RC-D	M9	Other trading assets	RCONF655, RCONF656, RCONF657
RC-D	M10	Other trading liabilities	RCONF658,

Schedule	Item	Item Name	MDRM Number
			RCONF659, RCONF660
RC-L	1.a.(1)	Unused commitments for Home Equity Conversion Mortgage (HECM) reverse mortgages outstanding that are held for investment	RCONJ477
RC-L	1.a.(2)	Unused commitments for proprietary reverse mortgages outstanding that are held for investment Note: Items 1.a.(1) and 1.a.(2) of Schedule RC-L will be combined into one data item.	RCONJ478
RC-L	8	Spot foreign exchange contracts	RCON8765
RC-L	16.a	Over-the-counter derivatives: Net current credit exposure (Columns B, C, and D)	RCONG419, RCONG420, RCONG421
RC-L	16.b.(1)	Over-the-counter derivatives: Fair value of collateral: Cash—U.S. dollar (Columns B, C, and D)	RCONG424, RCONG425, RCONG426
RC-L	16.b.(2)	Over-the-counter derivatives: Fair value of collateral: Cash—Other currencies (Columns B, C, and D)	RCONG429, RCONG430, RCONG431
RC-L	16.b.(3)	Over-the-counter derivatives: Fair value of collateral: U.S. Treasury securities (Columns B, C, and D)	RCONG434, RCONG435, RCONG436
RC-L	16.b.(4)	Over-the-counter derivatives: Fair value of collateral: U.S. Government agency and U.S. Government-sponsored agency debt securities (Columns A, B, C, D, and E)	RCONG438, RCONG439, RCONG440, RCONG441, RCONG442
RC-L	16.b.(5)	Over-the-counter derivatives: Fair value of collateral: Corporate bonds (Columns A, B, C, D, and E)	RCONG443, RCONG444, RCONG445, RCONG446, RCONG447
RC-L	16.b.(6)	Over-the-counter derivatives: Fair value of collateral: Equity securities (Columns A, B, C, D, and E)	RCONG448, RCONG449, RCONG450, RCONG451, RCONG452
RC-L	16.b.(7)	Over-the-counter derivatives: Fair value of collateral: All other collateral (Columns B, C, and D)	RCONG454, RCONG455 RCONG456

Schedule	Item	Item Name	MDRM Number
		Note: Amounts reported in items 16.b.(4), 16.b.(5), and 16.b.(6), Columns A and E, will be included in item 16.b.(7), Columns A and E.	
RC-L	16.b.(8)	Over-the-counter derivatives: Fair value of collateral: Total fair value of collateral (Columns B, C, and D) Note: Amounts reported in items 16.a, 16.b.(1), 16.b.(2), 16.b.(3), 16.b.(4), 16.b.(5), 16.b.(6), and 16.b.(7), Columns B, C, and D, will be included in items 16.a, 16.b.(1), 16.b.(2), 16.b.(3), and 16.b.(7), Column E.	RCONG459, RCONG460 RCONG461
RC-M	2.b	Purchased credit card relationships and nonmortgage servicing assets Note: Amounts reported in item 2.b will be included in item 2.c, All other identifiable intangible assets.	RCONB026
RC-M	3.f	Foreclosed properties from "GNMA loans" Note: Amounts reported in item 3.f will be included in item 3.c, Other real estate owned: 1—4 family residential properties.	RCONC979

<u>Other Impacts to Data Items</u>

<u>Schedule</u>	**<u>Item</u>**	**<u>Item Name</u>**	**<u>MDRM Number</u>**
RC	10 (New)	Intangible assets Note: Items 10.a and 10.b of Schedule RC will be combined into this data item.	RCON2143
RC-B	2 (New)	U.S. Government agency and sponsored agency obligations (exclude mortgage-backed securities (Columns A through D) Note: Items 2.a and 2.b of Schedule RC-B removed above will be combined into this data item (Columns A through D).	TBD (4 MDRMs)
RC-B	5.b (New)	Structured financial products (Columns A	TBD (4 MDRMs)

		through D) Note: Items 5.b.(1), 5.b.(2), and 5.b.(3) of Schedule RC-B removed above will be combined into this data item (Columns A through D).	
RC-D	5.a (New)	Structured financial products Note: Items 5.a.(1), 5.a.(2), and 5.a.(3) of Schedule RC-D removed above will be combined into this data item.	TBD
RC-D	6.a.(1) (New)	Loans secured by 1–4 family residential properties Note: Items 6.a.(3)(a), 6.a.(3)(b)(1), and 6.a.(3)(b)(2) of Schedule RC-D removed above will be combined into this data item.	TBD
RC-D	6.a.(2) (New)	All other loans secured by real estate Note: Items 6.a.(1), 6.a.(2), 6.a.(4), and 6.a.(5) of Schedule RC-D removed above will be combined into this data item.	TBD
RC-D	6.c (New)	Loans to individuals for household, family and other personal expenditures (i.e., consumer loans) (includes purchased paper) Note: Items 6.c.(1), 6.c.(2), 6.c.(3), and 6.c.(4) of Schedule RC-D removed above will be combined into this data item.	TBD
RC-D	M1.a.(1) (New)	Unpaid principal balance of loans measured at fair value: Loans secured by 1–4 family residential properties Note: Items M1.a.(3)(a), M1.a.(3)(b)(1), and M1.a.(3)(b)(2) of Schedule RC-D removed above will be combined into this data item.	TBD
RC-D	M1.a.(2) (New)	Unpaid principal balance of loans measured at fair value: All other loans secured by real estate Note: Items M1.a.(1), M1.a.(2), M1.a.(4), and M1.a.(5) of Schedule RC-D removed above will be combined into this data	TBD

		item.	
RC-D	M1.c (New)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures Note: Items M1.c.(1), M1.c.(2), M1.c.(3), and M1.c.(4) of Schedule RC-D removed above will be combined into this data item.	TBD
RC-L	1.a.(1) (New)	Unused commitments for reverse mortgages outstanding that are held for investment Note: Items 1.a.(1) and 1.a.(2) of Schedule RC-L removed above will be combined into this data item.	TBD
RC-M	2.b (Re-mapping)	Goodwill Note: Schedule RC, item 10.a will be moved to Schedule RC-M, new item 2.b., and the phrase "other than goodwill" will be removed from the caption for Schedule RC-M, item 2.	RCON3163

Data Items with a Reduction in Frequency of Collection

Semiannual Reporting (June 30 and December 31)

Schedule	Item	Item Name	MDRM Number
RI	M12	Noncash income from negative amortization on closed-end loans secured by 1–4 family residential properties	RIADF228
RC-B	M3	Amortized cost of held-to-maturity securities sold or transferred to available-for-sale or trading securities during the calendar year-to-date	RCON1778
RC-C, Part I	M7.a	Purchased credit-impaired loans held for investment accounted for in accordance with FASB ASC 310-30: Outstanding balance	RCONC779
RC-C, Part I	M7.b	Purchased credit-impaired loans held for investment accounted for in accordance	RCONC780

Schedule	Item	Item Name	MDRM Number
		with FASB ASC 310-30: Amount included in Schedule RC-C, Part I, items 1 through 9	
RC-C, Part I	M8.a	Total amount of closed-end loans with negative amortization features secured by 1–4 family residential properties	RCONF230
RC-C, Part I	M8.b	Total maximum remaining amount of negative amortization contractually permitted on closed-end loans secured by 1–4 family residential properties	RCONF231
RC-C, Part I	M8.c	Total amount of negative amortization on closed-end loans secured by 1–4 family residential properties included in the amount reported in Memorandum item 8.a above	RCONF232
RC-C, Part I	M12.a	Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year: Loans secured by real estate (Columns A through C)	RCONG091, RCONG092, RCONG093
RC-C, Part I	M12.b	Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year: Commercial and industrial loans (Columns A through C)	RCONG094, RCONG095, RCONG096
RC-C, Part I	M12.c	Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year: Loans to individuals for household, family, and other personal expenditures (Columns A through C)	RCONG097, RCONG098, RCONG099
RC-C, Part I	M12.d	Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in	RCONG100, RCONG101, RCONG102

Schedule	Item	Item Name	MDRM Number
		business combinations with acquisition dates in the current calendar year: All other loans and all leases (Columns A through C)	
RC-L	1.b.(1)	Unused consumer credit card lines	RCONJ455
RC-L	1.b.(2)	Other unused credit card lines	RCONJ456
RC-L	11.a	Year-to-date merchant credit card sales volume: Sales for which the reporting bank is the acquiring bank	RCONC223
RC-L	11.b	Year-to-date merchant credit card sales volume: Sales for which the reporting bank is the agent bank with risk	RCONC224
RC-N	M7	Additions to nonaccrual assets during the quarter Note: This caption would be revised to "Additions to nonaccrual assets during the last 6 months."	RCONC410
RC-N	M8	Nonaccrual assets sold during the quarter Note: This caption would be revised to "Nonaccrual assets sold during the last 6 months."	RCONC411
RC-N	M9.a	Purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3): Outstanding balance (Columns A through C)	RCONL183, RCONL184, RCONL185
RC-N	M9.b	Purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3): Amount included in Schedule RC-N, items 1 through 7, above (Columns A through C)	RCONL186, RCONL187, RCONL188

Annual Reporting (December)

Schedule	Item	Item Name	MDRM Number
RC-M	9	Do any of the bank's Internet websites have transactional capability, i.e., allow the bank's customers to execute transactions on their accounts through the website?	RCON4088
RC-M	14.a	Total assets of captive insurance	RCONK193

Schedule	Item	Item Name	MDRM Number
		subsidiaries	
RC-M	14.b	Total assets of captive reinsurance subsidiaries	RCONK194

Data Items with an Increase in Reporting Threshold

Schedule RC-D is to be completed by banks that reported total trading assets of *$10 million* or more in any of the four preceding calendar quarters and all banks meeting the FDIC's definition of a large or highly complex institution for deposit insurance assessment purposes.

To be completed by banks with $10 billion or more in total assets

Schedule	Item	Item Name	MDRM Number
RC-B	M5.a	Asset-backed securities: Credit card receivables (Columns A, B, C, and D)	RCONB838, RCONB839, RCONB840, RCONB841
RC-B	M5.b	Asset-backed securities: Home equity lines (Columns A, B, C, and D)	RCONB842, RCONB843, RCONB844, RCONB845
RC-B	M5.c	Asset-backed securities: Automobile loans (Columns A, B, C, and D)	RCONB846, RCONB847, RCONB848, RCONB849
RC-B	M5.d	Asset-backed securities: Other consumer loans (Columns A, B, C, and D)	RCONB850, RCONB851, RCONB852, RCONB853
RC-B	M5.e	Asset-backed securities: Commercial and industrial loans (Columns A, B, C, and D)	RCONB854, RCONB855, RCONB856, RCONB857
RC-B	M5.f	Asset-backed securities: Other (Columns A, B, C, and D)	RCONB858, RCONB859, RCONB860, RCONB861
RC-B	M6.a	Structured financial products by underlying collateral or reference assets: Trust preferred securities issued by financial institutions (Columns A through D)	RCONG348, RCONG349, RCONG350, RCONG351
RC-B	M6.b	Structured financial products by underlying collateral or reference assets:	RCONG352, RCONG353,

		Trust preferred securities issued by real estate investment trusts (Columns A through D)	RCONG354, RCONG355
RC-B	M6.c	Structured financial products by underlying collateral or reference assets: Corporate and similar loans (Columns A through D)	RCONG356, RCONG357, RCONG358, RCONG359
RC-B	M6.d	Structured financial products by underlying collateral or reference assets: 1–4 family residential MBS issued or guaranteed by U.S. Government-sponsored enterprises (GSEs) (Columns A through D)	RCONG360, RCONG361, RCONG362, RCONG363
RC-B	M6.e	Structured financial products by underlying collateral or reference assets: 1–4 family residential MBS not issued or guaranteed by GSEs (Columns A through D)	RCONG364, RCONG365, RCONG366, RCONG367
RC-B	M6.f	Structured financial products by underlying collateral or reference assets: Diversified (mixed) pools of structured financial products (Columns A through D)	RCONG368, RCONG369, RCONG370, RCONG371
RC-B	M6.g	Structured financial products by underlying collateral or reference assets: Other collateral or reference assets (Columns A through D)	RCONG372, RCONG373, RCONG374, RCONG375

To be completed by banks with components of other noninterest income in amounts greater than $100,000 that exceed 7 percent of Schedule RI, item 5.l

Schedule	**Item**	**Item Name**	**MDRM Number**
RI-E	1.a through 1.l	Other noninterest income (from Schedule RI, item 5.l)	RIADC013, RIADC014, RIADC016, RIAD4042, RIADC015, RIADF555, RIADT047, RIAD4461, RIAD4462, RIAD4463

To be completed by banks with components of other noninterest expense in amounts greater than $100,000 that exceed 7 percent of Schedule RI, item 7.d

Schedule	Item	Item Name	MDRM Number
RI-E	2.a through 2.p	Other noninterest expense (from Schedule RI, item 7.d)	RIADC017, RIAD0497, RIAD4136, RIADC018, RIAD8403, RIAD4141, RIAD4146, RIADF556, RIADF557, RIADF558, RIADF559, RIADY923, RIADY924, RIAD4464, RIAD4467, RIAD4468

To be completed by banks with total trading assets of $10 million or more in any of the four preceding calendar quarters and all banks meeting the FDIC's definition of a large or highly complex institution for deposit insurance assessment purposes.

Schedule	Item	Item Name	MDRM Number
RC-K	7	Trading assets	RCON3401

Appendix D

FFIEC 031: To be completed by banks with domestic and foreign offices and banks with domestic offices only and consolidated total assets of $100 billion or more

Data Items Removed, Other Impacts to Data Items, Data Items with a Reduction in Frequency of Collection, or Data Items with an Increase in Reporting Threshold

Data Items Removed

Schedule	Item	Item Name	MDRM Number
RI-E	1.f	Net change in the fair values of financial instruments accounted for under a fair value option	RIADF229
RI-E	1.h	Gains on bargain purchases	RIADJ447
RC	10.a	Goodwill Note: Schedule RC, item 10.a will be moved to Schedule RC-M, new item 2.b.	RCFD3163
RC	10.b	Other intangible assets Note: Items 10.a and 10.b of Schedule RC will be combined into one data item.	RCFD0426
RC-B	2.a	U.S. Government agency obligations (exclude mortgage-backed securities): Issued by U.S. Government agencies (Columns A through D)	RCFD1289, RCFD1290, RCFD1291, RCFD1293
RC-B	2.b	U.S. Government agency obligations (exclude mortgage-backed securities): Issued by U.S. Government-sponsored agencies (Columns A through D) Note: Items 2.a and 2.b of Schedule RC-B will be combined into one data item.	RCFD1294, RCFD1295, RCFD1297, RCFD1298
RC-B	5.b.(1)	Structured financial products: Cash (Columns A through D)	RCFDG336, RCFDG337, RCFDG338, RCFDG339
RC-B	5.b.(2)	Structured financial products: Synthetic (Columns A through D)	RCFDG340, RCFDG341, RCFDG342, RCFDG343
RC-B	5.b.(3)	Structured financial products: Hybrid	RCFDG344,

Schedule	Item	Item Name	MDRM Number
		(Columns A through D) Note: Items 5.b.(1), 5.b.(2), and 5.b.(3) of Schedule RC-B will be combined into one data item.	RCFDG345, RCFDG346, RCFDG347
RC-D	All data items reported in Column B, "Domestic offices"	Column B, "Domestic offices" Note: Data items 6.a.(1) through 6.a.(5), Column B, will be combined into two data items to be collected for the consolidated bank in Column A, which will replace data item 6.a, Column A. In addition, data items M1.a.(1) through M1.a.(5), Column B, will be combined into two data items to be collected for the consolidated bank in Column A, which will replace data item M.1.a, Column A. Data items 12 and 15, Column B, will be moved to Schedule RC-H, new items 19 and 20. Data items 6.a.(1) through 6.d, Column B, will be combined into one data item and moved to Schedule RC-H, new item 21.	RCON3531, RCON3532, RCON3533, RCONG379, RCONG380, RCONG381, RCONK197, RCONK198, RCONG383, RCONG384, RCONG385, RCONG386, RCONF604, RCONF605, RCONF606, RCONF607, RCONF611, RCONF612, RCONF613, RCONF614, RCONF615, RCONF616, RCONK199, RCONK210, RCONF618, RCON3541, RCON3543, RCON3545, RCON3546, RCONF624, RCON3547, RCON3548, RCONF625, RCONF626, RCONF627, RCONF628, RCONF629, RCONF630, RCONF631, RCONF632,

Schedule	Item	Item Name	MDRM Number
			RCONF633, RCONF634, RCONK200, RCONK211, RCONF636, RCONF639, RCONF640, RCONG299, RCONG332, RCONG333, RCONG334, RCONG335, RCONG651, RCONG652, RCONG387, RCONG388
RC-D	5.a.(1)	Structured financial products: Cash (Column A)	RCFDG383
RC-D	5.a.(2)	Structured financial products: Synthetic (Column A)	RCFDG384
RC-D	5.a.(3)	Structured financial products: Hybrid (Column A) Note: Items 5.a.(1), 5.a.(2), and 5.a.(3) of Schedule RC-D, Column A, will be combined into one data item.	RCFDG385
RC-D	6.a	Loans secured by real estate (Column A)	RCFDF610
RC-D	6.c.(1)	Loans to individuals for household, family, and other personal expenditures: Credit cards (Column A)	RCFDF615
RC-D	6.c.(2)	Loans to individuals for household, family, and other personal expenditures: Other revolving credit plans (Column A)	RCFDF616
RC-D	6.c.(3)	Loans to individuals for household, family, and other personal expenditures: Automobile loans (Column A)	RCFDK199
RC-D	6.c.(4)	Loans to individuals for household, family, and other personal expenditures:	RCFDK210

Schedule	Item	Item Name	MDRM Number
		Other consumer loans Note: Items 6.c.(1), 6.c.(2), 6.c.(3), and 6.c.(4) of Schedule RC-D, Column A, will be combined into one data item.	
RC-D	M1.a	Unpaid principal balance of loans measured at fair value: Loans secured by real estate (Column A)	RCFDF790
RC-D	M1.c.(1)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures: Credit cards (Column A)	RCFDF633
RC-D	M1.c.(2)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures: Other revolving credit plans (Column A)	RCFDF634
RC-D	M1.c.(3)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures: Automobile loans (Column A)	RCFDK200
RC-D	M1.c.(4)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures: Other consumer loans (Column A) Note: Items M1.c.(1), M1.c.(2), M1.c.(3), and M1.c.(4) of Schedule RC-D, Column A, will be combined into one data item.	RCFDK211
RC-D	M6	Retained beneficial interests in securitizations	RCFDF651
RC-L	1.a.(1)	Unused commitments for Home Equity Conversion Mortgage (HECM) reverse mortgages outstanding that are held for investment	RCONJ477
RC-L	1.a.(2)	Unused commitments for proprietary reverse mortgages outstanding that are held for investment Note: Items 1.a.(1) and 1.a.(2) of Schedule RC-L will be combined into one data item.	RCONJ478

Schedule	Item	Item Name	MDRM Number
RC-L	16.a	Over-the-counter derivatives: Net current credit exposure (Column B)	RCFDG419
RC-L	16.b.(1)	Over-the-counter derivatives: Fair value of collateral: Cash—U.S. dollar (Column B)	RCFDG424
RC-L	16.b.(2)	Over-the-counter derivatives: Fair value of collateral: Cash—Other currencies (Column B)	RCFDG429
RC-L	16.b.(3)	Over-the-counter derivatives: Fair value of collateral: U.S. Treasury securities (Column B)	RCFDG434
RC-L	16.b.(4)	Over-the-counter derivatives: Fair value of collateral: U.S. Government agency and U.S. Government-sponsored agency debt securities (Column B)	RCFDG439
RC-L	16.b.(5)	Over-the-counter derivatives: Fair value of collateral: Corporate bonds (Column B)	RCFDG444
RC-L	16.b.(6)	Over-the-counter derivatives: Fair value of collateral: Equity securities (Column B)	RCFDG449
RC-L	16.b.(7)	Over-the-counter derivatives: Fair value of collateral: All other collateral (Column B)	RCFDG454
RC-L	16.b.(8)	Over-the-counter derivatives: Fair value of collateral: Total fair value of collateral (Column B) Note: Amounts reported in items 16.a, 16.b.(1), 16.b.(2), 16.b.(3), 16.b.(4), 16.b.(5), 16.b.(6), 16.b.(7), and 16.b.(8), Column B, will be included in items 16.a, 16.b.(1), 16.b.(2), 16.b.(3), 16.b.(4), 16.b.(5), 16.b.(6), 16.b.(7), and 16.b.(8), Column E.	RCFDG459
RC-M	2.b	Purchased credit card relationships and nonmortgage servicing assets Note: Amounts reported in item 2.b will be included in item 2.c, All other identifiable intangible assets.	RCFDB026
RC-M	3.f	Foreclosed properties from "GNMA loans" Note: Amounts reported in item 3.f will	RCONC979

Schedule	Item	Item Name	MDRM Number
		be included in item 3.c, Other real estate owned: 1—4 family residential properties.	

Other Impacts to Data Items

Schedule	Item	Item Name	MDRM Number
RC	10 (New)	Intangible assets Note: Items 10.a and 10.b of Schedule RC will be combined into this data item.	RCFD2143
RC-B	2 (New)	U.S. Government agency and sponsored agency obligations (exclude mortgage-backed securities) (Columns A through D) Note: Items 2.a and 2.b of Schedule RC-B removed above will be combined into this data item (Columns A through D).	TBD (4 MDRMs)
RC-B	5.b (New)	Structured financial products (Columns A through D) Note: Items 5.b.(1), 5.b.(2), and 5.b.(3) of Schedule RC-B removed above will be combined into this data item (Columns A through D).	TBD (4 MDRMs)
RC-D	5.a (New)	Structured financial products Note: Items 5.a.(1), 5.a.(2), and 5.a.(3) of Schedule RC-D, Column A, removed above will be combined into this data item.	TBD
RC-D	6.a.(1) (New)	Loans secured by 1—4 family residential properties Note: Items 6.a.(3)(a), 6.a.(3)(b)(1), and 6.a.(3)(b)(2) of Schedule RC-D, Column B, removed above will be combined into this data item for the consolidated bank in Column A, which will partially replace item 6.a, Column A.	TBD
RC-D	6.a.(2) (New)	All other loans secured by real estate	TBD

		Note: Items 6.a.(1), 6.a.(2), 6.a.(4), and 6.a.(5) of Schedule RC-D, Column B, removed above will be combined into this data item for the consolidated bank in Column A, which will partially replace item 6.a, Column A.	
RC-D	6.c (New)	Loans to individuals for household, family and other personal expenditures (i.e., consumer loans) (includes purchased paper) Note: Items 6.c.(1), 6.c.(2), 6.c.(3), and 6.c.(4) of Schedule RC-D removed above will be combined into this data item.	TBD
RC-D	M1.a.(1) (New)	Unpaid principal balance of loans measured at fair value: Loans secured by 1—4 family residential properties Note: Items M1.a.(3)(a), M1.a.(3)(b)(1), and M1.a.(3)(b)(2) of Schedule RC-D, Column B, removed above will be combined into this data item for the consolidated bank in Column A, which will partially replace item M.1.a, Column A.	TBD
RC-D	M1.a.(2) (New)	Unpaid principal balance of loans measured at fair value: All other loans secured by real estate Note: Items M1.a.(1), M1.a.(2), M1.a.(4), and M1.a.(5) of Schedule RC-D, Column B, removed above will be combined into this data item for the consolidated bank in Column A, which will partially replace item M.1.a, Column A.	TBD
RC-D	M1.c (New)	Unpaid principal balance of loans measured at fair value: Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper) Note: Items M1.c.(1), M1.c.(2), M1.c.(3), and M1.c.(4) of Schedule RC-D, Column A, removed above will be combined into this data item.	TBD

RC-H	19 (Re-mapping)	Total trading assets Note: Schedule RC-D, item 12, Column B, will be moved to Schedule RC-H, item 19. The proposed threshold change applicable to Schedule RC-D applies to this item.	RCON3545
RC-H	20 (Re-mapping)	Total trading liabilities Note: Schedule RC-D, item 15, Column B, will be moved to Schedule RC-H, item 20. The proposed threshold change applicable to Schedule RC-D applies to this item.	RCON3548
RC-H	21 (New)	Total loans held for trading Note: The proposed threshold change applicable to Schedule RC-D applies to this item.	TBD
RC-L	1.a (New)	Unused commitments for reverse mortgages outstanding that are held for investment Note: Items 1.a.(1) and 1.a.(2) of Schedule RC-L removed above will be combined into this data item.	TBD
RC-M	2.b (Re-mapping)	Goodwill Note: Schedule RC, item 10.a will be moved to Schedule RC-M, new item 2.b., and the phrase "other than goodwill" will be removed from the caption for Schedule RC-M, item 2.	RCFD3163

<u>Data Items with a Reduction in Frequency of Collection</u>

<u>Semiannual Reporting (June 30 and December 31)</u>

Schedule	Item	Item Name	MDRM Number
RI	M12	Noncash income from negative amortization on closed-end loans secured by 1–4 family residential properties	RIADF228

Schedule	Item	Item Name	MDRM Number
RC-B	M3	Amortized cost of held-to-maturity securities sold or transferred to available-for-sale or trading securities during the calendar year-to-date	RCFD1778
RC-C, Part I	M7.a	Purchased credit-impaired loans held for investment accounted for in accordance with FASB ASC 310-30: Outstanding balance	RCFDC779
RC-C, Part I	M7.b	Purchased credit-impaired loans held for investment accounted for in accordance with FASB ASC 310-30: Amount included in Schedule RC-C, Part I, items 1 through 9	RCFDC780
RC-C, Part I	M8.a	Total amount of closed-end loans with negative amortization features secured by 1–4 family residential properties	RCONF230
RC-C, Part I	M8.b	Total maximum remaining amount of negative amortization contractually permitted on closed-end loans secured by 1–4 family residential properties	RCONF231
RC-C, Part I	M8.c	Total amount of negative amortization on closed-end loans secured by 1–4 family residential properties included in the amount reported in Memorandum item 8.a above	RCONF232
RC-C, Part I	M12.a	Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year: Loans secured by real estate (Columns A through C)	RCFDG091, RCFDG092, RCFDG093
RC-C, Part I	M12.b	Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year: Commercial and industrial loans (Columns A through C)	RCFDG094, RCFDG095, RCFDG096
RC-C, Part I	M12.c	Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases	RCFDG097, RCFDG098, RCFDG099

Schedule	Item	Item Name	MDRM Number
		held for investment that were acquired in business combinations with acquisition dates in the current calendar year: Loans to individuals for household, family, and other personal expenditures (Columns A through C)	
RC-C, Part I	M12.d	Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year: All other loans and all leases (Columns A through C)	RCFDG100, RCFDG101, RCFDG102
RC-L	1.b.(1)	Unused consumer credit card lines	RCFDJ455
RC-L	1.b.(2)	Other unused credit card lines	RCFDJ456
RC-L	11.a	Year-to-date merchant credit card sales volume: Sales for which the reporting bank is the acquiring bank	RCFDC223
RC-L	11.b	Year-to-date merchant credit card sales volume: Sales for which the reporting bank is the agent bank with risk	RCFDC224
RC-N	M7	Additions to nonaccrual assets during the quarter Note: This caption would be revised to "Additions to nonaccrual assets during the last 6 months."	RCFDC410
RC-N	M8	Nonaccrual assets sold during the quarter Note: This caption would be revised to "Nonaccrual assets sold during the last 6 months."	RCFDC411
RC-N	M9.a	Purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3): Outstanding balance (Columns A through C)	RCFDL183, RCFDL184, RCFDL185
RC-N	M9.b	Purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3): Amount included in Schedule RC-N, items 1 through 7, above (Columns A through C)	RCFDL186, RCFDL187, RCFDL188

Annual Reporting (December)

Schedule	Item	Item Name	MDRM Number
RC-M	9	Do any of the bank's Internet websites have transactional capability, i.e., allow the bank's customers to execute transactions on their accounts through the website?	RCFD4088
RC-M	14.a	Total assets of captive insurance subsidiaries	RCFDK193
RC-M	14.b	Total assets of captive reinsurance subsidiaries	RCFDK194

<u>Data Items with an Increase in Reporting Threshold:</u>

Schedule RI-D is to be completed by banks with foreign offices (including Edge or Agreement subsidiaries and International Banking Facilities) *and* $10 billion or more in total assets where foreign office revenues, assets, or net income exceed 10 percent of consolidated total revenues, total assets, or net income.

Schedule RC-D is to be completed by banks that reported total trading assets of *$10 million* or more in any of the four preceding calendar quarters and all banks meeting the FDIC's definition of a large or highly complex institution for deposit insurance assessment purposes.

To be completed by banks with $10 billion or more in total assets

Schedule	**Item**	**Item Name**	**MDRM Number**
RC-B	M5.a	Asset-backed securities: Credit card receivables (Columns A, B, C, and D)	RCFDB838, RCFDB839, RCFDB840, RCFDB841
RC-B	M5.b	Asset-backed securities: Home equity lines (Columns A, B, C, and D)	RCFDB842, RCFDB843, RCFDB844, RCFDB845
RC-B	M5.c	Asset-backed securities: Automobile loans (Columns A, B, C, and D)	RCFDB846, RCFDB847, RCFDB848, RCFDB849
RC-B	M5.d	Asset-backed securities: Other consumer loans (Columns A, B, C, and D)	RCFDB850, RCFDB851, RCFDB852, RCFDB853
RC-B	M5.e	Asset-backed securities: Commercial and industrial loans (Columns A, B, C, and D)	RCFDB854, RCFDB855, RCFDB856, RCFDB857
RC-B	M5.f	Asset-backed securities: Other (Columns A, B, C, and D)	RCFDB858, RCFDB859, RCFDB860, RCFDB861
RC-B	M6.a	Structured financial products by underlying collateral or reference assets: Trust preferred securities issued by financial institutions (Columns A through D)	RCFDG348, RCFDG349, RCFDG350, RCFDG351
RC-B	M6.b	Structured financial products by underlying collateral or reference assets:	RCFDG352, RCFDG353,

		Trust preferred securities issued by real estate investment trusts (Columns A through D)	RCFDG354, RCFDG355
RC-B	M6.c	Structured financial products by underlying collateral or reference assets: Corporate and similar loans (Columns A through D)	RCFDG356, RCFDG357, RCFDG358, RCFDG359
RC-B	M6.d	Structured financial products by underlying collateral or reference assets: 1–4 family residential MBS issued or guaranteed by U.S. Government-sponsored enterprises (GSEs) (Columns A through D)	RCFDG360, RCFDG361, RCFDG362, RCFDG363
RC-B	M6.e	Structured financial products by underlying collateral or reference assets: 1–4 family residential MBS not issued or guaranteed by GSEs (Columns A through D)	RCFDG364, RCFDG365, RCFDG366, RCFDG367
RC-B	M6.f	Structured financial products by underlying collateral or reference assets: Diversified (mixed) pools of structured financial products (Columns A through D)	RCFDG368, RCFDG369, RCFDG370, RCFDG371
RC-B	M6.g	Structured financial products by underlying collateral or reference assets: Other collateral or reference assets (Columns A through D)	RCFDG372, RCFDG373, RCFDG374, RCFDG375

To be completed by banks with $10 billion or more in total trading assets

Schedule	**Item**	**Item Name**	**MDRM Number**
RC-D	M2.a	Loans measured at fair value that are past due 90 days or more: Fair value (Column A)	RCFDF639
RC-D	M2.b	Loans measured at fair value that are past due 90 days or more: Unpaid principal balance (Column A)	RCFDF640
RC-D	M3.a	Structured financial products by underlying collateral or reference assets: Trust preferred securities issued by financial institutions (Column A)	RCFDG299
RC-D	M3.b	Structured financial products by underlying collateral or reference assets: Trust preferred securities issued by real estate investment trusts (Column A)	RCFDG332
RC-D	M3.c	Structured financial products by	RCFDG333

		underlying collateral or reference assets: Corporate and similar loans (Column A)	
RC-D	M3.d	Structured financial products by underlying collateral or reference assets: 1–4 family residential MBS issued or guaranteed by U.S. Government-sponsored enterprises (GSEs) (Column A)	RCFDG334
RC-D	M3.e	Structured financial products by underlying collateral or reference assets: 1–4 family residential MBS not issued or guaranteed by GSEs (Column A)	RCFDG335
RC-D	M3.f	Structured financial products by underlying collateral or reference assets: Diversified (mixed) pools of structured financial products (Column A)	RCFDG651
RC-D	M3.g	Structured financial products by underlying collateral or reference assets: Other collateral or reference assets (Column A)	RCFDG652
RC-D	M4.a	Pledged trading assets: Pledged securities (Column A)	RCFDG387
RC-D	M4.b	Pledged trading assets: Pledged loans (Column A)	RCFDG388
RC-D	M5.a	Asset-backed securities: Credit card receivables	RCFDF643
RC-D	M5.b	Asset-backed securities: Home equity lines	RCFDF644
RC-D	M5.c	Asset-backed securities: Automobile loans	RCFDF645
RC-D	M5.d	Asset-backed securities: Other consumer loans	RCFDF646
RC-D	M5.e	Asset-backed securities: Commercial and industrial loans	RCFDF647
RC-D	M5.f	Asset-backed securities: Other	RCFDF648
RC-D	M7.a	Equity securities: Readily determinable fair values	RCFDF652
RC-D	M7.b	Equity securities: Other	RCFDF653
RC-D	M8	Loans pending securitization	RCFDF654
RC-D	M9	Other trading assets	RCFDF655, RCFDF656, RCFDF657
RC-D	M10	Other trading liabilities	RCFDF658, RCFDF659, RCFDF660

To be completed by banks with total trading assets of $10 million or more for any quarter of the preceding calendar year

Schedule	**Item**	**Item Name**	**MDRM Number**
RI	M8.a	Trading revenue: Interest rate exposures	RIAD8757
RI	M8.b	Trading revenue: Foreign exchange exposures	RIAD8758
RI	M8.c	Trading revenue: Equity security and index exposures	RIAD8759
RI	M8.d	Trading revenue: Commodity and other exposures	RIAD8760
RI	M8.e	Trading revenue: Credit exposures	RIADF186

To be completed by banks with components of other noninterest income in amounts greater than $100,000 that exceed 7 percent of Schedule RI, item 5.l

Schedule	**Item**	**Item Name**	**MDRM Number**
RI-E	1.a through 1.l	Other noninterest income (from Schedule RI, item 5.l)	RIADC013, RIADC014, RIADC016, RIAD4042, RIADC015, RIADF555, RIADT047, RIAD4461, RIAD4462, RIAD4463

To be completed by banks with components of other noninterest expense in amounts greater than $100,000 that exceed 7 percent of Schedule RI, item 7.d

Schedule	**Item**	**Item Name**	**MDRM Number**
RI-E	2.a through 2.p	Other noninterest expense (from Schedule RI, item 7.d)	RIADC017, RIAD0497, RIAD4136, RIADC018, RIAD8403, RIAD4141, RIAD4146, RIADF556, RIADF557, RIADF558, RIADF559, RIADY923, RIADY924, RIAD4464,

Schedule	Item	Item Name	MDRM Number
			RIAD4467, RIAD4468

To be completed by banks with total trading assets of $10 million or more in any of the four preceding calendar quarters and all banks meeting the FDIC's definition of a large or highly complex institution for deposit insurance assessment purposes.

Schedule	Item	Item Name	MDRM Number
RC-K	7	Trading assets	RCFD3401