

DRAFT

Modified February 2020

OMB No. 7100-0341
Expiration Date: December 31, 2022

Instructions for the Capital Assessments and Stress Testing Reports (Reporting Form FR Y-14A)

This Report is required by law: section 165 of the Dodd-Frank Act (12 U.S.C. § 5365), section 5 of the Bank Holding Company Act (12 U.S.C. § 1844), and section 10 of the Home Owners' Loan Act (12 U.S.C. § 1467a). Public reporting burden for this information collection is estimated to vary from approximately 10 to 987 hours per response, with an average of 159 hours per response, including time to gather and maintain data in the required form and to review instructions and complete the information collection. Comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing the burden, may be sent to Secretary, Board of Governors of the Federal Reserve System, 20th and C Streets, NW, Washington, DC 20551, and to the Office of Management and Budget, Paperwork Reduction Project (7100-0341), Washington, DC 20503

DRAFT

Contents

GENERAL INSTRUCTIONS	3
WHO MUST REPORT	4
WHERE TO SUBMIT THE REPORTS	5
WHEN TO SUBMIT THE REPORTS	6
HOW TO PREPARE THE REPORTS:	7
Schedule A—Summary	9
A.1 INCOME STATEMENT, BALANCE SHEET, AND CAPITAL	10
A.1.a—Income Statement.....	10
A.1.b—Balance Sheet	27
A.1.c—Risk-Weighted Assets (RWA).....	41
A.1.c.1—Standardized RWA.....	41
A.1.c.2—Advanced RWA.....	48
A.1.d—Capital.....	49
A.2 RETAIL	66
A.2.a—Retail Balance and Loss Projections.....	66
A.3 AFS/HTM SECURITIES	72
A.3.a—Projected OTTI for AFS Securities and HTM by Security.....	74
A.3.b—High-Level OTTI Methodology and Assumptions for AFS and HTM Securities by Portfolio	74
A.3.c—Projected OTTI for AFS and HTM Securities by Portfolio	74
A.3.d— Projected OCI and Fair Value for AFS and Impaired HTM	74
A.3.e—Actual AFS and HTM Fair Market Value Sources by Portfolio	75
A.4 TRADING	77
A.6 BHC OR IHC OR SLHC OPERATIONAL RISK SCENARIO INPUTS AND PROJECTIONS	83
A.7 PRE-PROVISION NET REVENUE (PPNR)	84
A.7.a—PPNR Projections Sub-schedule.....	87
A.7.b—PPNR Net Interest Income (NII) Sub-schedule	102
A.7.c—PPNR Metrics.....	110
Schedule B—Scenario	122
Schedule C—Regulatory Capital Instruments	125
Schedule D—Regulatory Capital Transitions (Discontinued).....	147
Schedule E—Operational Risk	148
E.1—BHC, SLHC OR IHC LEGAL RESERVES REPORTING	148
E.2—MATERIAL RISK IDENTIFICATION	148
E.3—OPERATIONAL RISK SCENARIOS	148
Schedule F – Business Plan Changes.....	149
F.1 – MATERIAL BUSINESS PLAN CHANGES	150
F.2 – PRO FORMA COMBINING BALANCE SHEET FOR MERGERS AND MATERIAL ACQUISITIONS	152

GENERAL INSTRUCTIONS

The Capital Assessments and Stress Testing Report (FR Y-14A report) collects detailed data on quantitative projections of balance sheet assets and liabilities, income, losses, and capital across a range of macroeconomic scenarios and qualitative information on methodologies used to develop internal projections of capital across scenarios. It applies to bank holding companies (BHCs) with total consolidated assets of \$100 billion or more; intermediate holding companies (IHCs) with \$100 billion or more in total assets that are subsidiaries of foreign banking organizations; and covered savings and loan holding companies of \$100 billion or more in total consolidated assets (SLHCs).¹

The FR Y-14A report is comprised of a Summary, Scenario, Regulatory Capital Instruments, Regulatory Capital Transitions, Operational Risk, Business Plan Changes, and Retail Repurchase Exposure schedules, each with multiple supporting sub-schedules. The number of schedules a BHC, IHC, or SLHC must complete is subject to materiality thresholds and certain other criteria. For instance, large and noncomplex firms² are not required to complete certain sub-schedules. BHCs, IHCs, and SLHCs report projections on the FR Y-14A schedules across supervisory scenarios provided by the Federal Reserve (supervisory baseline and severely adverse), as well as BHC or IHC defined scenarios (BHC baseline and BHC stress). One or more of the macroeconomic scenarios includes a market risk shock that the BHCs, SLHCs or IHCs will assume when making trading and counterparty loss projections. The Federal Reserve will provide details about the macroeconomic scenarios to the BHCs, SLHCs and IHCs.

BHCs, SLHCs and IHCs are also required to submit qualitative information supporting their projections, including descriptions of the methodologies used to develop the internal projections of capital across scenarios and other analyses that support their comprehensive capital plans. Further information regarding the qualitative and technical requirements of required supporting documentation is provided in individual schedules as appropriate, as well as in Appendix A: Supporting Documentation.

As noted, this document includes requirements and supervisory expectations related to supporting documentation for all BHCs, SLHCs and IHCs subject to the Y-14 reporting requirements. That supporting documentation is intended to help to ensure that BHCs, SLHCs and IHCs subject to Y-14 reporting requirements provide accurate and comprehensive information for their Y-14 reports. In certain cases, particularly as outlined in Appendix A, this document describes additional expectations for certain capital planning practices to help support BHCs', SLHCs' and IHCs' Y-14 reporting. However, this document is not intended to describe the full set of expectations for capital planning. The full set of capital planning expectations have been consolidated in two Federal Reserve two supervisory letters, SR Letters 15-18 and 15-19, issued in December 2015. Importantly, those two SR letters clarify that

¹ Covered SLHCs are those which are not substantially engaged in insurance or commercial activities. For more information, see the definition of "covered savings and loan holding company" provided in 12 CFR 217.2 and 12 CFR 238.2(ee).

² A large and noncomplex firm is a BHC or a U.S. intermediate holding company subsidiary of a foreign banking organization (IHC) with total consolidated assets of at least \$50 billion but less than \$250 billion; total consolidated nonbank assets of less than \$75 billion, and is not a U.S. GSIB.

DRAFT

the capital planning expectations for LISCC³ and large and complex firms⁴ (as defined in those letters) are higher than the expectations for Large and Noncomplex Firms (as defined in those letters).⁵ A BHC or IHC should refer to SR Letter 15-18 or SR Letter 15-19, as applicable, for the capital planning expectations applicable to that BHC or IHC (depending on the BHC's or IHC's size and complexity), as this document applies to all BHCs and IHCs subject to Y-14 reporting. To the extent that this document references expectations that may not be applicable to a large and noncomplex firm pursuant to SR Letter 15-19, a large and noncomplex firm will not be held to those expectations but should instead refer to the expectations in SR Letter 15-19.

Who Must Report

A. Reporting Criteria

BHCs with total consolidated assets of \$100 billion or more and IHCs with total consolidated assets of \$100 billion or more, as defined by the capital plan rule (12 CFR 225.8), are required to submit the Capital Assessment and Stress Testing report (FR Y-14A/Q/M) to the Federal Reserve. Covered SLHCs with total consolidated assets of \$100 billion or more, as defined by the Board's savings and loan holding company rule (12 CFR part 238), are required to submit the Capital Assessment and Stress Testing report (FR Y14A/Q/M) to the Federal Reserve.⁶ The capital plan and savings and loan holding company rules define total consolidated assets as the average of the company's total consolidated assets over the course of the previous four calendar quarters, as reflected on the BHC's, IHC's or SLHC's Consolidated Financial Statement for Bank Holding Companies (FR Y-9C). Total assets shall be calculated based on the due date of the bank or intermediate holding company's most recent FR Y-9C. If the BHC, IHC, or SLHC has not filed an FR Y-9C for each of the four most recent quarters, the average of the BHC's, IHC's or SLHC's total consolidated assets in the most recent consecutive quarters as reported quarterly on the BHC's, IHC's or SLHC's FR Y-9C should be used in the calculation. Firms are required to file the FR Y-14 reports beginning with the reporting period after the end of the quarter in which the threshold was met. For example, if a firm crossed the \$100 billion threshold on July 25 of a given year, and met the threshold based on their FR Y-9C submission as of the end of the third quarter, the firm would be required to first report the FR Y-14Q and FR Y-14A reports as of December 31 of that year, and the FR Y-14M report as of December of that year. See "When to Submit the Reports" for information regarding when the reports are to be submitted to the Federal Reserve.

Separate schedules must be reported for each scenario as required, unless otherwise specified in the schedule or sub-schedule instructions (for example for historical data collections on the Retail Repurchase sub-schedule, for which only the baseline scenario is required). Certain data elements within the schedules are subject to materiality thresholds. The instructions to these data schedules provide details on how to determine whether a BHC, SLHC or IHC must submit a specific schedule, sub-schedule, or data element.

³ A LISCC firm is a BHC that is subject to the Federal Reserve's Large Institution Supervisory Coordinating Committee (LISCC) framework.

⁴ A large and complex firm is a BHC, other than a LISCC firm, with total consolidated assets of \$250 billion or more, or nonbank assets of \$75 billion or more.

⁵ SR Letter 15-18 sets forth capital planning expectations for BHCs and IHCs that are subject to the Federal Reserve's Large Institution Supervisory Coordinating Committee (LISCC) framework and Large and Complex Firms. SR Letter 15-19 sets forth capital planning expectations for Large and Noncomplex Firms, as defined in the capital plan rule.

⁶ SLHCs will begin filing the FR Y-14A starting with the December 31, 2021, report date.

DRAFT

Reporting Requirements

All schedules are required to be reported by all BHCs and IHCs with the exception of certain sub-schedules of the Summary schedule, which should be filed as described below:

Securities Market Value Source, Retail Repurchase, Trading, Counterparty, and Advanced RWA sub-schedules (Summary Schedule): Large and noncomplex firms are not required to complete these subschedules.

CCR schedule and Trading and CCR sub-schedules (Summary Schedule): BHCs, SLHCs, and IHCs subject to supervisory stress tests and that (1) have aggregate trading assets and liabilities of \$50 billion or more, or aggregate trading assets and liabilities equal to 10 percent or more of total consolidated assets, and (2) are not “large and noncomplex firms” under the Board’s capital plan rule⁷ must submit this schedule and sub-schedules.⁸ Additionally, the Board or the Director of the Division of Banking Supervision and Regulation of the Federal Reserve Board, acting under delegated authority, may require any company to complete the CCR schedule and sub-schedule under 12 CFR 252.144(b)(2).

Other Reporting Requirements for SLHCs

SLHCs are only required to complete Schedule A – Summary; Schedule E – Operational Risk; and Schedule F – Business Plan Changes. Category IV SLHCs⁹ are only required to complete Schedule E – Operational Risk.

B. Exemptions

BHCs, SLHCs and IHCs that do not meet the reporting criteria listed above are exempt from reporting.

Where to Submit the Reports

All BHCs, SLHCs and IHCs subject to these reporting requirements must submit completed reports electronically via a secure collection website (Intralinks) or the Reporting Central submission. BHCs, SLHCs and IHCs will be provided information on how to transmit data to the FR Y-14 IntraLinks Collaboration website. Requests for access to the Intralinks site should be sent to ccar.support@ccar.frb.org.

For requirements regarding the submission of qualitative supporting information, please see Appendix

⁷ A large and noncomplex firm is defined under the capital plan rule as a firm that has average total consolidated assets of at least \$50 billion but less than \$250 billion, has average total nonbank assets of less than \$75 billion, and is not identified as global systemically important bank holding company (GSIB) under the Board’s rules. See 12 CFR 225.8(d)(9).

⁸ See the final notice (82 FR 59608) for further details regarding application of GMS for the 2018 exercise, and Trading and Counterparty submission for firms newly subject under the modified threshold.

⁹ A Category IV SLHC is a covered SLHC with total consolidated assets of at least \$100 billion but less than \$75 billion in cross-jurisdictional activity, weighted short-term wholesale funding, nonbank assets, or off-balance sheet exposure. See 12 CFR 238.10.

DRAFT

A: Supporting Documentation, in addition to instructions associated with each schedule for which supporting documentation might be required.

When to Submit the Reports

BHCs, SLHCs and IHCs must file the appropriate FR Y-14A schedules annually according to the appropriate time schedules described below. All schedules will be due on or before the end of the submission date (unless that day falls on a weekend (subject to timely filing provisions)). Early submission, including submission of schedules on a flow basis prior to the due date, aids the Federal Reserve in reviewing and processing data and is encouraged.

If the submission date falls on a weekend or holiday, the data must be received on the first business day after the weekend or holiday. No other extensions of time for submitting reports will be granted.

Schedules and Sub-Sub-schedules	Data as-of-date	Submission Date to Federal Reserve
Summary, Macro Scenario	<ul style="list-style-type: none"> Data as-of December 31st. 	<ul style="list-style-type: none"> Data are due April 5th of the following year. Adjusted summary schedule submission: The Federal Reserve will notify companies at least 14 calendar days in advance of the date on which it expects companies to submit any adjusted capital actions.
Operational Risk, and Business Plan Changes, and Collection of Supplemental CECL Information schedules	<ul style="list-style-type: none"> Data as-of December 31st. 	<ul style="list-style-type: none"> Data are due April 5th of the following year.
<u>CCAR Market Shock exercise</u> Summary schedule <ul style="list-style-type: none"> Trading Risk Counterparty 	Data as-of a specified date in the first quarter. As-of-date would be communicated by Federal Reserve ¹⁰	<ul style="list-style-type: none"> Data are due April 5th
Regulatory Capital Instruments	<ul style="list-style-type: none"> Data as-of December 31st. 	<ul style="list-style-type: none"> Original submission: Data are due April 5th of the following year. Adjusted submission: The Federal Reserve will notify companies at least

¹⁰ As outlined in Sections 252.144 (Annual Stress Tests) of Regulation YY (12 CFR 252) and section 238.143 of Regulation LL (12 CFR 238), the as-of date will be October 1 of the calendar year preceding the year of the stress test cycle to March 1 of the calendar year of the stress test cycle and will be communicated to the BHCs and SLHCs by March 1st of the calendar year. BHCs and SLHCs are permitted to submit the CCR schedule and the Trading and CCR sub-schedules of the Summary schedule as-of another recent reporting date prior to the supplied as-of date as appropriate.

DRAFT

		<p>14 calendar days in advance of the date on which it expects companies to submit any adjusted capital actions.</p> <ul style="list-style-type: none">• Incremental submission: <u>Within 15 days after making any capital distribution in excess of those included in a firm’s capital plan At the time the firm seeks approval for additional capital distributions</u> (see 12 CFR 225.8(kg)), or notify the Federal Reserve of its intention to make additional capital distributions under the de minimis exception (see 12 CFR 225.8(g)(2)).
--	--	--

How to Prepare the Reports:

A. Applicability of GAAP

BHCs, SLHCs and IHCs are required to prepare and file the FR Y-14A schedules in accordance with U.S. generally accepted accounting principles (GAAP) and these instructions. The financial records of the BHCs, SLHCs and IHCs should be maintained in such a manner and scope to ensure the FR Y-14A is prepared in accordance with these instructions and reflects a fair presentation of the BHCs', IHCs', or SLHCs' financial condition and assessment of performance under stressed scenarios.

In June 2016, the Financial Accounting Standards Board (FASB) issued accounting standards update (ASU) 2016-13 which introduced the current expected credit losses methodology (CECL) for estimating allowances for credit losses and added Topic 326, Credit Losses, to the Accounting Standards Codification (ASC). The new credit losses standard changes several aspects of existing U.S. GAAP. Firms must apply ASU 2016-13 for FR Y-14 reporting purposes in accordance with the effective dates set forth in the ASU, ranging from the first quarter of 2019 through the fourth quarter of 2022. As a result, the reporting of information associated with ASU 2016-13 will begin with the FR Y-14 reports effective September 30, 2019, but would not be fully phased in and reflected on the reporting forms and instructions until the FR Y-14A report for December 31, 2022.

Institutions that have adopted CECL should refer to Regulation YY, 12 CFR part 252, regarding the requirement to reflect ASU 2016-13 for a given stress test cycle.

B. Rules of Consolidation

Please reference the FR Y-9C General Instructions for a discussion regarding the rules of consolidation.

C. Projections

Many schedules collect data on a “projection horizon”, which includes one quarter of actual data followed by at least nine quarters of projected data. Where projections are required, the following applies:

- The “projection horizon” refers to the nine quarters starting with the first quarter of the reporting year (e.g., from the first quarter of 2013 through the first quarter of 2015).

DRAFT

- Column headings refer to PQ1 through PQ9. PQ stands for projected quarter. PQ1 through PQ9 are nine quarterly projections over which the planning horizon extends.
- In some cases, the projected quarters will extend beyond the nine-quarter planning horizon (as is the case of projected future losses charged to the repurchase reserve), necessitating PQ10 or more.

D. Technical Details

The following instructions apply generally to the FR Y-14A schedules, unless otherwise specified. For further information on the technical specifications for this report, including details regarding the submission type, please see the Technical Instructions.

- Do not enter any information in gray highlighted or shaded cells, including those with embedded formulas. Only non-shaded cells should be completed by institutions.
- Ensure that any internal consistency checks are complete prior to submission.
- Report dollar values in millions of US dollars (unless specified otherwise).
- Dates should be entered in an YYYYMMDD format (unless specified otherwise).
- Report negative numbers with a minus (-) sign.
- Report data as an integer (unless specified otherwise)
- An amount, zero or null should be entered for all items, except in those cases where other options such as “not available” or “other” are specified. If information is not available or not applicable and no such options are offered, the field should be left blank.
- Report income and loss data on a quarterly basis, and not on a cumulative or year-to-date basis.

E. Other Instructional Guidance

BHCs and SLHCs should review the following published documents (in the order listed below) when determining the precise definition to be used in completing the schedules. Where applicable, references to the FR Y-9C have been provided in the FR Y-14A instructions and templates noting associations between the reporting series.

- The FR Y-14A instructions;
- The FR Y-14 Q/M instructions;
- The latest available FR Y-9C instructions published on the Federal Reserve’s public web site: <http://www.federalreserve.gov/reportforms>

For purposes of completing certain FR Y-14A schedules, BHCs and IHCs should also consult the following references for relevant guidance:

- The most recent CapPR Instructions
- The most recent CCAR Instructions

F. Confidentiality

As these data will be collected as part of the supervisory process, they are subject to confidential treatment under exemption 8 of the Freedom of Information Act (5 U.S.C. 552(b)(8)). In addition, commercial and financial information contained in these information collections may be exempt from disclosure under Exemption 4.5 (U.S.C. 552(b)(4)). Disclosure determinations would be made on a case-by-case basis.

G. Amended Reports

The Federal Reserve will require the filing of amended reports if previous submissions contain significant errors. In addition, a reporting institution must file an amended report when it or the

DRAFT

Federal Reserve discovers significant errors or omissions subsequent to submission of a report. Failure to file amended reports on a timely basis may subject the institution to supervisory action.

If resubmissions are required, institutions should contact the appropriate Reserve Bank, as well as the FR Y-14 mailbox at info@ccar.frb.org, and resubmit data via the Intralinks website.

H. Questions and Requests for Interpretations

BHCs, IHCs and SLHCs should submit any questions or requests for interpretations by e-mail to their designated Reserve Bank contact (for FR Y-14A questions) or info@CCAR.frb.org (for CCAR questions).

I. Attestation

For Bank Holding Companies, Intermediate Holding Companies, and Savings and Loan Holding Companies that are subject to supervision by the Federal Reserve's Large Institution Supervision Committee,¹¹ the Capital Assessments and Stress Testing Reports (FR Y-14A/Q/M) data submissions must be accompanied by an attestation signed by the chief financial officer or an equivalent senior officer. By signing the attestation cover page, the authorized officer acknowledges that any knowing and willful misrepresentation or omission of a material fact on this report constitutes fraud in the inducement and may subject the officer to legal sanctions provided by 18 USC 1001 and 1007. Material weaknesses in internal controls or material errors or omissions in the data submitted must be reported through the respondent's designated Federal Reserve System contacts as they are identified.

The cover page for the FR Y-14A/Q/M attestations should be submitted as follows:

- FR Y-14A/Q (annual submission): the attestation associated with the annual submission (i.e., data reported as of December 31, including the global market shock submission) should be submitted on the last submission date for those reports, typically April 5 of the following year.¹²
- FR Y-14M: for those firms that file the FR Y-14M reports, the three attestations for the three months of the quarter will be due on one date, the final FR Y-14M submission date for those three intervening months.¹³ Note that one attestation page per monthly submission is still required.
- FR Y-14Q: the FRY14Q attestation for the three remaining quarters (Q1, Q2, and Q3) should be submitted on the due date for the FR Y-14Q for that quarter.

A signed version of the attestation cover page and any supporting materials should be submitted electronically in Intralinks and tagged with the attestation submission type and applicable report date. Respondents must maintain in their files a signed attestation cover page.

Schedule A—Summary

¹¹ <http://www.federalreserve.gov/bankinforeg/large-institution-supervision.htm>

¹² For example, all of the FR Y-14Q schedules due 52 days after the as of date (typically mid-February), all of the FR Y-14A schedules due April 5, and the trading and counterparty schedules due on the global market shock submission date (March 15 at the latest) will be due on the latest of those dates, typically the annual submission date for the FR Y-14A report schedules (April 5).

¹³ For example, the attestation cover pages and any associated materials for the FR Y-14M reports with January, February, and March as of dates will be due on the data due date for the March FR Y-14M.

DRAFT

General Instructions

This document contains instructions for the FR Y-14A Summary schedule. The schedule includes data collection sub-schedules related to the following:

1. Income Statement, Balance Sheet, and Capital Statements;
2. Retail;
3. Securities;
4. Trading;
5. Counterparty Credit Risk;
6. Operational Risk; and
7. Pre-Provision Net Revenue (PPNR).

The bank holding company (BHC), intermediate holding company (IHC), or savings and loan holding company (SLHC) should submit a **separate** Summary schedule for **each** scenario.

A BHC or IHC that decides the supervisory baseline scenario is appropriate for its BHC or IHC baseline scenario should still submit an FR Y-14A for each scenario. The two submissions would differ in that the supervisory baseline FR Y-14A would contain a completed Capital - CCAR and Capital - DFAST; the BHC or IHC baseline submission would not contain a completed Capital - DFAST.

Under the BHC baseline, supervisory baseline and supervisory severely adverse scenarios, BHCs and IHCs should report the FR Y-14A summary schedule's worksheets, other than "Capital - DFAST" where applicable, assuming planned capital actions.

Under the supervisory baseline and supervisory severely adverse scenarios, SLHCs should report the FR Y-14A summary schedule's worksheets, assuming DFAST capital actions.

Under the BHC stress scenario, BHCs and IHCs should report the FR Y-14A summary schedule's worksheets assuming alternative capital actions. The BHC stress scenario submission would not contain a completed Capital - DFAST.

Each year the Board provides each BHC and IHC with the opportunity to adjust its planned capital actions based on the preliminary results of CCAR. A BHC or IHC that uses this opportunity and submits adjusted planned capital actions must submit an updated FR Y-14A Summary schedule Capital - CCAR worksheet under the BHC Baseline and Supervisory Severely Adverse scenarios. This submission would be labeled the "Adjusted" submission. For additional details regarding submission labels, refer to the Technical Instructions. The Board will notify companies of the date on which it expects companies to submit planned capital actions at least 14 calendar days prior to the expected deadline for submitted planned capital actions. Incremental capital actions would be submitted at the time the firm wishes to seek approval for additional capital distributions (see 12 CFR 225.8(g)) or notify the Federal Reserve of its intention to make additional capital distributions under the de minimis exception of the capital plan rule (see 12 CFR 225.8(g)(2)).

Supporting Documentation

Please refer to Appendix A: Supporting Documentation for guidance on providing supporting documentation.

A.1 Income Statement, Balance Sheet, and Capital

A.1.a—Income Statement

DRAFT

The Income Statement sub-schedule collects projections for the main components of the income statement. Federal Reserve Micro Data Reference Manual (MDRM) codes are provided in the 'Notes' column for many of the line items.¹⁴ Where applicable, use the definitions for the FR Y-9C line items corresponding to the MDRM code. For each scenario used, input the loan loss projections for the various line items in this sub-schedule. The BHC, SLHC or IHC should include losses tied to the relevant balances reported on the Balance Sheet sub-schedule. Losses associated with held for investment loans accounted for at amortized cost should be reported in the appropriate line items under the "Losses Associated With Loans Held for Investment Accounted for at Amortized Cost" section and any losses due to changes in the fair value of assets that are held for sale or held for investment under the fair value option should be reported in the appropriate line items under the "Losses Associated With Loans Held for Sale and Loans Accounted for Under the Fair Value Option" section.

For Corporate and CRE loans, if an MDRM number is not provided, use the same definitions as provided in the FR Y-14Q Corporate and Commercial Real Estate schedules. For credit card loans, use the same definitions as provided in the FR Y-14M Credit Card schedule. The Repurchase Reserve/Liability for Mortgage Reps and Warrants line items are included to provide information on the expected evolution of any reserve or accrued liability that has been established for losses related to sold or government-insured mortgage loans (first or second lien). Losses charged to this reserve can occur through contractual repurchases, settlement agreement, or litigation loss, including losses related to claims under securities law or fraud claims; it is likely that most losses charged to this reserve will come through contractual repurchases or settlements. Quarterly reserve/accrued liability levels and quarterly provisions and net charge-offs to the reserve/accrued liability should be reported as forecast under the applicable scenario. To ensure consistency across the sheets of each FR Y-14A summary workbook, the Provisions during the quarter line is linked to the PPNR Projections Sub-schedule rows where BHCs, IHCs and SLHCs are expected to report any provisions to the Repurchase Reserve/Liability for Mortgage Reps and Warrants. For the same reason, the Net charges during the quarter line is linked to Table G.3 in the Retail Repurchase Sub-schedule.

Line items 1 through 43 LOSSES ASSOCIATED WITH LOANS HELD FOR INVESTMENT AT AMORTIZED COST:

Line item 1 Real estate loans (in domestic offices)

This item is a shaded cell and is derived from the sum of items 2, 5, 8 and 14.

Line item 2 First lien mortgages (including HELOANS)

This item is a shaded cell and is derived from the sum of items 3 and 4.

Line item 3 First lien mortgages

Report losses associated with loans held for investment accounted for at amortized cost on all closed-end loans secured by first liens on 1 to 4 family residential properties, excluding closed-end first lien home equity loans (reported in item 4).

¹⁴ Each MDRM code is associated with a specific line item (data cell) on the FR Y-9C report. See <http://www.federalreserve.gov/reportforms/mdrm/> for a list of MDRM codes and data descriptions.

DRAFT

Line item 4 First lien home equity loans (HELOANS)

Report losses associated with loans held for investment accounted for at amortized cost on all closed-end first lien home equity loans.

Line item 5 Second/junior lien mortgages

This item is a shaded cell and is derived from the sum of items 6 and 7.

Line item 6 Closed-end junior loans

Report losses associated with loans held for investment accounted for at amortized cost on all closed-end loans secured by junior (i.e., other than first) liens on 1 to 4 family residential properties.

Line item 7 Home equity lines of credit (HELOCS)

Report losses associated with loans held for investment accounted for at amortized cost on the amount outstanding under revolving, open-end lines of credit secured by 1 to 4 family residential properties.

Line item 8 Commercial real estate (CRE) loans

This item is a shaded cell and is derived from the sum of items 9, 10, and 11.

Line item 9 Construction

Report losses associated with loans held for investment accounted for at amortized cost on construction, land development, and other land loans, as defined in the FR Y-9C, Schedule HC-C, items 1(a)(1) and 1(a)(2).

Line item 10 Multifamily

Report losses associated with loans held for investment accounted for at amortized cost on loans secured by multifamily (5 or more) residential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(d).

Line item 11 Nonfarm, nonresidential

This item is a shaded cell and is derived from the sum of items 12 and 13.

Line item 12 Owner-occupied

Report losses associated with loans held for investment accounted for at amortized cost on loans secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(1).

Line item 13 Non-owner-occupied

Report losses associated with loans held for investment accounted for at amortized cost on nonfarm nonresidential real estate loans that are not secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(2).

Line item 14 Loans secured by farmland

Report losses associated with loans held for investment accounted for at amortized cost on all loans secured by farmland, as defined in the FR Y-9C, Schedule HC-C, item 1(b).

Line item 15 Real estate loans (Not in domestic offices)

This item is a shaded cell and is derived from the sum of items 16, 17, 18 and 24.

DRAFT

Line item 16 First lien mortgages (Not in domestic offices)

Report losses associated with loans held for investment accounted for at amortized cost on all closed-end loans secured by first liens on 1 to 4 family residential properties, not held in domestic offices.

Line item 17 Second/junior lien mortgages (Not in domestic offices)

Report losses associated with loans held for investment accounted for at amortized cost on all loans secured by second/junior (i.e., other than first) liens on 1 to 4 family residential properties, not held in domestic offices.

Line item 18 Commercial real estate (CRE) loans (Not in domestic offices)

This item is a shaded cell and is derived from the sum of items 19, 20, and 21.

Line item 19 Construction (Not in domestic offices)

Report losses associated with loans held for investment accounted for at amortized cost on construction, land development, and other land loans, as defined in the FR Y-9C, Schedule HC-C, items 1(a)(1) and 1(a)(2), not held in domestic offices.

Line item 20 Multifamily (Not in domestic offices)

Report losses associated with loans held for investment accounted for at amortized cost on loans secured by multifamily (5 or more) residential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(d), not held in domestic offices.

Line item 21 Nonfarm, nonresidential (Not in domestic offices)

This item is a shaded cell and is derived from the sum of items 22 and 23.

Line item 22 Owner-occupied (Not in domestic offices)

Report losses associated with loans held for investment accounted for at amortized cost on loans secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(1), not held in domestic offices.

Line item 23 Non-owner-occupied (Not in domestic offices)

Report losses associated with loans held for investment accounted for at amortized cost on nonfarm nonresidential real estate loans that are not secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(2), not held in domestic offices.

Line item 24 Loans secured by farmland (Not in domestic offices)

Report losses associated with loans held for investment accounted for at amortized cost on all loans secured by farmland, as defined in the FR Y-9C, Schedule HC-C, item 1(b), not held in domestic offices.

Line item 25 C&I Loans

This item is a shaded cell and is derived from the sum of items 26, 27 and 28.

Line item 26 C&I Graded

Report losses associated with loans held for investment accounted for at amortized cost on all graded commercial and industrial (C&I) loans. Report only loans “graded” or “rated” using the reporting entity’s commercial credit rating system, as it is defined in the reporting entity’s normal course of business. This includes losses associated with domestic and international business and corporate credit card or charge card loans for which a commercially graded corporation is ultimately responsible

DRAFT

for repayment of credit losses incurred.

Line item 27 Small Business (Scored/Delinquency Managed)

Report losses associated with loans held for investment accounted for at amortized cost on small business loans. Report all "scored" or "delinquency managed" U.S. small business loans for which a commercial internal risk rating is not used or that uses a different scale than other corporate loans reported in the FR Y-9C, Schedule HC-C, items 2.a, 2.b, 3, 4.a, 4.b, 7, 9.a, 9.b.1, 9.b.2, 10.b, excluding corporate and small business credit card loans included in the FR Y-9C, Schedule HC-C, line 4.a.

Line item 28 Business and Corporate Card

Report losses associated with loans held for investment accounted for at amortized cost on loans extended under business and corporate credit cards. Business cards include small business credit card accounts where the loan is underwritten with the sole proprietor or primary business owner as applicant. Report at the control account level or the individual pay level (not at the sub-account level). Corporate cards include employer-sponsored credit cards for use by a company's employees. Exclude losses associated with corporate card or charge card loans included in Line item 26 (C&I Graded Loans).

Line item 29 Credit Cards

Report losses associated with loans held for investment accounted for at amortized cost on loans extended under consumer general purpose or private label credit cards. General purpose credit cards are credit cards that can be used at a wide variety of merchants, including any who accept MasterCard, Visa, American Express or Discover credit cards. Include affinity, co-brand cards in this category, and student cards if applicable. Private label credit cards are credit cards, also known as proprietary credit cards, tied to the retailer issuing the card and can only be used in that retailer's stores. Include oil & gas cards in this loan type, and student cards if applicable.

Line item 30 Other Consumer

This item is a shaded cell and is derived from the sum of items 31, 32, 33 and 34.

Line item 31 Auto Loans

Report losses associated with loans held for investment accounted for at amortized cost on auto loans, as defined in the FR Y-9C, Schedule HC-C, item 6(c).

Line item 32 Student Loans

Report losses associated with loans held for investment accounted for at amortized cost on student loans.

Line item 33 Other (consumer) loans backed by securities (non-purpose lending)

Report losses associated with loans held for investment accounted for at amortized cost on other consumer loans that are backed by securities (i.e., non-purpose lending).

Line item 34 Other (consumer)

Report losses associated with loans held for investment accounted for at amortized cost on all other consumer loans not reported in items 31, 32 or 33.

Line item 35 Other Loans

DRAFT

This item is a shaded cell and is derived from the sum of items 36, 37, 38, 39 and 40.

Line item 36 Loans to Foreign Governments

Report losses associated with loans held for investment accounted for at amortized cost on loans to foreign governments, as defined in the FR Y-9C, Schedule HC-C, item 7. Exclude losses associated with loans to foreign governments included in Line item 27 (Small Business Loans).

Line item 37 Agricultural Loans

Report losses associated with loans held for investment accounted for at amortized cost on agricultural loans, as defined in the FR Y-9C, Schedule HC-C, item 3. Exclude losses associated with agricultural loans included in Line item 27 (Small Business Loans).

Line item 38 Loans for Purchasing or Carrying Securities (secured or unsecured)

Report losses associated with loans held for investment accounted for at amortized cost on loans for purchasing or carrying securities (secured or unsecured), as defined in the FR Y-9C, Schedule HC-C, item 9.b.(1). Exclude losses associated with loans for purchasing or carrying securities included in Line item 27 (Small Business Loans).

Line item 39 Loans to Depositories and Other Financial Institutions

Report losses associated with loans held for investment accounted for at amortized cost on loans to depositories and other financial Institutions (secured or unsecured), as defined in the FR Y-9C, Schedule HC-C, items 2.a, 2.b, and 9.a. Exclude losses associated with loans to depositories and other financial institutions included in Line item 27 (Small Business Loans).

Line item 40 All Other Loans and Leases

This item is a shaded cell and is derived from the sum of items 41 and 42.

Line item 41 All Other Loans (exclude consumer loans)

Report losses associated with loans held for investment accounted for at amortized cost on all other loans (excluding consumer loans), as defined in the FR Y-9C, Schedule HC-C, item 9.b.(2). Exclude losses associated with all other loans included in Line item 27 (Small Business Loans).

Line item 42 All Other Leases

Report losses associated with loans held for investment accounted for at amortized cost on all other leases (excluding consumer leases), as defined in the FR Y-9C, Schedule HC-C, item 10.b. Exclude losses associated with all other leases included in Line item 27 (Small Business Loans).

Line item 43 Total Loans and Leases

Report the sum of items 1, 15, 25, 29, 30 and 35.

Line items 44 through 57 LOSSES ASSOCIATED WITH HELD FOR SALE LOANS AND LOANS ACCOUNTED FOR UNDER THE FAIR VALUE OPTION:

Line item 44 Real estate loans (in domestic offices)

This item is a shaded cell and is derived from the sum of items 45, 46, 47 and 48.

Line item 45 First Lien Mortgages

Report losses associated with held for sale loans and loans accounted for under the fair value option on all closed-end loans secured by first liens on 1 to 4 family residential properties, including closed-

DRAFT

end first lien home equity loans.

Line item 46 Second/Junior Lien Mortgages

Report losses associated with held for sale loans and loans accounted for under the fair value option on all loans secured by junior (i.e., other than first) liens on 1 to 4 family residential properties.

Line item 47 Commercial real estate (CRE) loans

Report losses associated with held for sale loans and loans accounted for under the fair value option on all construction, multifamily, and nonfarm nonresidential loans, as defined in the FR Y-9C, Schedule HC-C, items 1.a.(1), 1.a.(2), 1.d, 1.e.(1) and 1.e.(2).

Line item 48 Loans secured by farmland

Report losses associated with held for sale loans and loans accounted for under the fair value option on all loans secured by farmland, as defined in the FR Y-9C, Schedule HC-C, item 1(b).

Line item 49 Real estate loans (not in domestic offices)

This item is a shaded cell and is derived from the sum of items 50, 51 and 52.

Line item 50 Residential Mortgages (not in domestic offices)

Report losses associated with held for sale loans and loans accounted for under the fair value option on all loans secured by 1 to 4 family residential properties, including both first lien and second/junior lien loans, not held in domestic offices.

Line item 51 Commercial real estate (CRE) loans (not in domestic offices)

Report losses associated with held for sale loans and loans accounted for under the fair value option on all construction, multifamily, and nonfarm nonresidential loans, as defined in the FR Y-9C, Schedule HC-C, items 1.a.(1), 1.a.(2), 1.d, 1.e.(1) and 1.e.(2), not held in domestic offices.

Line item 52 Loans secured by farmland (not in domestic offices)

Report losses associated with held for sale loans and loans accounted for under the fair value option on all loans secured by farmland, as defined in the FR Y-9C, Schedule HC-C, item 1(b), not held in domestic offices.

Line item 53 C&I Loans

Report losses associated with held for sale loans and loans accounted for under the fair value option on all commercial and industrial loans, as defined in items 26, 27 and 28.

Line item 54 Credit Cards

Report losses associated with held for sale loans and loans accounted for under the fair value option on loans extended under consumer general purpose or private label credit cards. General purpose credit cards are credit cards that can be used at a wide variety of merchants, including any who accept MasterCard, Visa, American Express or Discover credit cards. Include affinity, co-brand cards in this category, and student cards if applicable. Private label credit cards are credit cards, also known as proprietary credit cards, tied to the retailer issuing the card and can only be used in that retailer's stores. Include oil & gas cards in this loan type, and student cards if applicable.

Line item 55 Other Consumer

Report losses associated with held for sale loans and loans accounted for under the fair value option

DRAFT

on all other consumer loans, as defined in items 31, 32, 33 and 34.

Line item 56 All Other Loans and Leases

Report losses associated with held for sale loans and loans accounted for under the fair value option on all other loans and leases, as defined in items 36, 37, 38, 39, 41 and 42.

Line item 57 Total Loans and Leases

This item is a shaded cell and is derived from the sum of items 44, 49, 53, 54, 55 and 56.

Line items 58 through 63 TRADING ACCOUNT:

Line item 58 Trading Mark-to-market (MTM) Losses

Line item 58 must equal the sum of the totals reported in item 18, columns A and B, on the FR Y-14A, Summary - Trading Schedule, with the sign reversed.

Line item 59 Trading Issuer Default Losses

Line item 59 must equal item 1 on the Counterparty Risk Schedule.

Line item 60 Counterparty Credit MTM Losses (CVA losses)

Line item 60 must equal item 2 on the Counterparty Risk Schedule.

Line item 61 Counterparty Default losses

Line item 61 must equal item 3 on the Counterparty Risk Schedule.

Line item 62 Total Trading and Counterparty losses

This item is a shaded cell and is derived from the sum of items 58, 59, 60, and 61. BHCs and SLHCs should include Schedule A.5 – Counterparty Credit Risk worksheet item 4 “Other Counterparty Losses” in item 65 “Other Losses” on this worksheet.

Line items 63 through 67 OTHER LOSSES:

Line item 63 Goodwill Impairment

Report losses associated with goodwill impairment, as defined in the FR Y-9C, Schedule HC-M, Memorandum item 12(b). Under GAAP (ASC 350-20-35-30), "Goodwill of a reporting unit shall be tested for impairment between annual tests if an event occurs or circumstances change that would more likely than not reduce the fair value of a reporting unit below its carrying amount." However, it is acceptable for purposes of this exercise to provide annual estimates as long as the resulting quarterly capital projections would not differ materially from those generated using quarterly impairment projections.

Line item 64 Valuation Adjustment for firm's own debt under fair value option (FVO)

Report losses associated with the valuation adjustment for the firm's own debt under the fair value option (FVO).

Line item 65 Other losses

Report all other losses not reported in items 1 through 64. Describe these losses in the supporting documentation.

DRAFT

Line item 66 Total Other Losses

Report the sum of all other losses included in items 63, 64, and 65.

Line item 67 Total Losses

Report the sum of items 43, 57, 62 and 66.

Line items 68 through 116 ALLOWANCE FOR LOAN AND LEASE LOSSES (ALLL)¹⁵:**Line item 68 Total allowance for loan and lease losses, prior quarter**

The total allowance for loan and lease losses prior quarter. This item is derived as the sum of items 68a-d.

Institutions that have not adopted ASU 2016-13 should report ALLL prior quarter in line item 68a. Institutions that have adopted ASU 2016-13 should report allowance for credit losses on loans and leases prior quarter, credit losses on held-to-maturity debt securities prior quarter, available-for-sale debt securities prior quarter, and all other financial assets prior quarter in item 68a, 68b, 68c, and 68d, respectively.

Line item 68a ALLL prior quarter

Report the total allowance for loan and lease losses as of the end of the prior quarter.

Line item 68b Allowance for credit losses on held-to-maturity debt securities, prior quarter

Report the total allowance for credit losses on held-to-maturity debt securities as of the end of the prior quarter.

Line item 68c Allowance for credit losses on available-for-sale debt securities, prior quarter

Report the total allowance for credit losses on available-for-sale debt securities as of the end of the prior quarter.

Line item 68d Allowance for credit losses on all other financial assets, prior quarter.

Report the total allowance for credit losses on all other financial assets not included in items 68a-c above.

Line item 69 Real Estate Loans (in Domestic Offices)

Report the sum of items 70, 74, and 78.

Line item 70 Residential Mortgages (in Domestic Offices)

Report the sum of the allowance for loan and lease losses included in items 71, 72, and 73.

Line item 71 First Lien Mortgages (in Domestic Offices)

Report the allowance for loan and lease losses for all loans secured by first liens on 1 to 4 family residential properties, including first lien home equity loans, held in domestic offices.

Line item 72 Closed-end Junior Liens (in Domestic Offices)

Report the allowance for loan and lease losses for all closed-end loans secured by junior (i.e., other than first) liens on 1 to 4 family residential properties, held in domestic offices.

¹⁵ Institutions that have adopted ASU 2016-13 should report the specified breakouts of allowances and provisions for credit losses in items 69 through 90 and 92 through 113.

DRAFT

Line item 73 HELOCs (in Domestic Offices)

Report the allowance for loan and lease losses for revolving, open-end lines of credit secured by 1 to 4 family residential properties, held in domestic offices.

Line item 74 CRE Loans (in Domestic Offices)

Report the sum of the allowance for loan and lease losses included in items 76, 77 and 78.

Line item 75 Construction (in Domestic Offices)

Report the allowance for loan and lease losses for construction, land development, and other land loans (as defined in the FR Y-9C, Schedule HC-C, items 1(a)(1) and 1(a)(2)), held in domestic offices.

Line item 76 Multifamily (in Domestic Offices)

Report the allowance for loan and lease losses for loans secured by multifamily (5 or more) residential properties (as defined in the FR Y-9C, Schedule HC-C, item 1(d)), held in domestic offices.

Line item 77 Nonfarm, Non-residential (in Domestic Offices)

Report the allowance for loan and lease losses for loans secured by nonfarm nonresidential properties (as defined in the FR Y-9C, Schedule HC-C, items 1(e)(1) and 1(e)(2)), held in domestic offices.

Line item 78 Loans Secured by Farmland (in Domestic Offices)

Report the allowance for loan and lease losses for loans secured by farmland (as defined in the FR Y-9C, Schedule HC-C, item 1(b)), held in domestic offices.

Line item 79 Real Estate Loans (Not in Domestic Offices)

Report the sum of items 81, 82 and 83.

Line item 80 Residential Mortgages (Not in Domestic Offices)

Report the allowance for loan and lease losses for all loans secured by 1 to 4 family residential properties, including both first lien and second/junior lien loans, not held in domestic offices.

Line item 81 CRE Loans (Not in Domestic Offices)

Report the allowance for loan and lease losses for all construction, multifamily, and nonfarm nonresidential loans (as defined in the FR Y-9C, Schedule HC-C, items 1.a.(1), 1.a.(2), 1.d, 1.e.(1) and 1.e.(2)), not held in domestic offices.

Line item 82 Farmland (Not in Domestic Offices)

Report the allowance for loan and lease losses for all loans secured by farmland (as defined in the FR Y-9C, Schedule HC-C, item 1(b)), not held in domestic offices.

Line item 83 C&I Loans

Report the sum of items 85, 86 and 87.

Line item 84 C&I Graded

Report the allowance for loan and lease losses for all graded commercial and industrial (C&I) loans. Report the associated allowance only for loans “graded” or “rated” using the reporting entity’s commercial credit rating system, as it is defined in the reporting entity’s normal course of business. This includes the allowance for loan and lease losses for all domestic and international business and

DRAFT

corporate credit card or charge card loans for which a commercially graded corporation is ultimately responsible for repayment of credit losses incurred.

Line item 85 Small Business (Scored/Delinquency Managed)

Report the allowance for loan and lease losses for small business loans. Report the associated allowance for all "scored" or "delinquency managed" U.S. small business loans for which a commercial internal risk rating is not used or that uses a different scale than other corporate loans reported in the FR Y-9C, Schedule HC-C, items 2.a, 2.b, 3, 4.a, 4.b, 7, 9.a, 9.b.1, 9.b.2, 10.b, excluding corporate and small business credit card loans included in the FR Y-9C, Schedule HC-C, line 4.a.

Line item 86 Business and Corporate Card

Report the allowance for loan and lease losses for loans extended under business and corporate credit cards. Business cards include small business credit card accounts where the loan is underwritten with the sole proprietor or primary business owner as applicant. Report at the control account level or the individual pay level (not at the sub-account level). Corporate cards include employer-sponsored credit cards for use by a company's employees. Exclude the allowance for loan and lease losses related to corporate card or charge card loans included in Line item 85 (C&I Graded Loans).

Line item 87 Credit Cards

Report the allowance for loan and lease losses for loans extended under consumer general purpose or private label credit cards. General purpose credit cards are credit cards that can be used at a wide variety of merchants, including any who accept MasterCard, Visa, American Express or Discover credit cards. Include affinity, co-brand cards in this category, and student cards if applicable. Private label credit cards are credit cards, also known as proprietary credit cards, tied to the retailer issuing the card and can only be used in that retailer's stores. Include oil & gas cards in this loan type, and student cards if applicable.

Line item 88 Other Consumer

Report the allowance for loan and lease losses for all other consumer loans, as defined in items 31, 32, 33 and 34.

Line item 89 All Other Loans and Leases

Report the allowance for loan and lease losses for all other loans and leases, as defined in items 36, 37, 38, 39, 41 and 42.

Line item 90 Unallocated

Report any unallocated portion of the allowance for loan and lease losses.

Line item 91 Total Provisions during the quarter

Report the provision for loan and lease losses during the quarter, as defined in the FR Y-9C, Schedule HI, item 4. This item would be derived as the sum of items 91a-d.

Institutions that have not adopted ASU 2016-13 should report provisions for loan and lease losses during the quarter in line item 91a. Institutions that have adopted ASU 2016-13 should report provisions for credit losses on loans and leases during the quarter, provisions for held-to-maturity during the quarter, available-for-sale debt securities during the quarter, and all other financial assets during the quarter in item 91a, 91b, 91c, and 91d, respectively.

DRAFT

Line item 91a Provisions for loan and lease losses during the quarter

Report the provision for loan and lease losses during the quarter, as defined in the FR Y-9C, Schedule HI-B, part II, item 5, column A. This item should align with the sum of provisions for loan and lease losses reported in the loan types broken out below.

Line item 91b Provisions for credit losses on held-to-maturity debt securities during the quarter

Report the provision for credit losses on held-to-maturity securities during the quarter, as defined in the FR Y-9C, Schedule HI-B, part II, item 5, column B.

Line item 91c Provisions for credit losses on available-for-sale securities during the quarter

Report the provision for credit losses on available-for-sale securities during the quarter, as defined in the FR Y-9C, Schedule HI-B, part II, item 5, column C.

Line item 91d Provisions for credit losses on all other financial assets during the quarter

Report the provision for credit losses on all other financial assets not included in items 91a-c above.

Line item 92 Real Estate Loans (in Domestic Offices)

Report the sum of items 93, 97, and 101.

Line item 93 Residential Mortgages (in Domestic Offices)

Report the sum of the provision for loan and lease losses included in items 94, 95, and 96.

Line item 94 First Lien Mortgages (in Domestic Offices)

Report the provision for loan and lease losses for all loans secured by first liens on 1 to 4 family residential properties, including first lien home equity loans, held in domestic offices.

Line item 95 Closed-end Junior Liens (in Domestic Offices)

Report the provision for loan and lease losses for all closed-end loans secured by junior (i.e., other than first) liens on 1 to 4 family residential properties, held in domestic offices.

Line item 96 HELOCs (in Domestic Offices)

Report the provision for loan and lease losses for revolving, open-end lines of credit secured by 1 to 4 family residential properties, held in domestic offices.

Line item 97 CRE Loans (in Domestic Offices)

Report the sum of the provision for loan and lease losses included in items 98, 99, and 100.

Line item 98 Construction (in Domestic Offices)

Report the provision for loan and lease losses for construction, land development, and other land loans, as defined in the FR Y-9C, Schedule HC-C, items 1(a)(1) and 1(a)(2), held in domestic offices.

Line item 99 Multifamily (in Domestic Offices)

Report the provision for loan and lease losses for loans secured by multifamily (5 or more) residential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(d), held in domestic offices.

Line item 100 Nonfarm, Non-residential (in Domestic Offices)

Report the provision for loan and lease losses for loans secured by nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, items 1(e)(1) and 1(e)(2), held in domestic offices.

DRAFT

Line item 101 Loans Secured by Farmland (in Domestic Offices)

Report the provision for loan and lease losses for loans secured by farmland as defined in the FR Y-9C, Schedule HC-C, item 1(b), held in domestic offices.

Line item 102 Real Estate Loans (Not in Domestic Offices)

Report the sum of items 104, 105 and 106.

Line item 103 Residential Mortgages (Not in Domestic Offices)

Report the provision for loan and lease losses for all loans secured by 1 to 4 family residential properties, including both first lien and second/junior lien loans, not held in domestic offices.

Line item 104 CRE Loans (Not in Domestic Offices)

Report the provision for loan and lease losses for all construction, multifamily, and nonfarm nonresidential loans, as defined in the FR Y-9C, Schedule HC-C, items 1.a.(1), 1.a.(2), 1.d, 1.e.(1) and 1.e.(2), not held in domestic offices.

Line item 105 Farmland (Not in Domestic Offices)

Report the provision for loan and lease losses for all loans secured by farmland, as defined in the FR Y-9C, Schedule HC-C, item 1(b), not held in domestic offices.

Line item 106 C&I Loans

Report the sum of items 107, 108, and 109.

Line item 107 C&I Graded

Report the provision for loan and lease losses for all graded commercial and industrial (C&I) loans. Report the associated provision only for loans "graded" or "rated" using the reporting entity's commercial credit rating system, as it is defined in the reporting entity's normal course of business. This includes the provision for loan and lease losses for all domestic and international business and corporate credit card or charge card loans for which a commercially graded corporation is ultimately responsible for repayment of credit losses incurred.

Line item 108 Small Business (Scored/Delinquency Managed)

Report the provision for loan and lease losses for small business loans. Report the associated provision for all "scored" or "delinquency managed" U.S. small business loans for which a commercial internal risk rating is not used or that uses a different scale than other corporate loans reported in the FR Y-9C, Schedule HC-C, items 2.a, 2.b, 3, 4.a, 4.b, 7, 9.a, 9.b.1, 9.b.2, 10.b of schedule HC-C of the FR Y-9C excluding corporate and small business credit card loans included in the FR Y-9C, Schedule HC-C, line 4.a.

Line item 109 Business and Corporate Cards

Report the provision for loan and lease losses for loans extended under business and corporate credit cards. Business cards include small business credit card accounts where the loan is underwritten with the sole proprietor or primary business owner as applicant. Report at the control account level or the individual pay level (not at the sub-account level). Corporate cards include employer-sponsored credit cards for use by a company's employees. Exclude the provision for loan and lease losses related to corporate card or charge card loans included in Line item 107 (C&I Graded Loans).

DRAFT

Line item 110 Credit Cards

Report the provision for loan and lease losses for loans extended under consumer general purpose or private label credit cards. General purpose credit cards are credit cards that can be used at a wide variety of merchants, including any who accept MasterCard, Visa, American Express or Discover credit cards. Include affinity, co-brand cards in this category, and student cards if applicable. Private label credit cards are credit cards, also known as proprietary credit cards, tied to the retailer issuing the card and can only be used in that retailer's stores. Include oil & gas cards in this loan type, and student cards if applicable.

Line item 111 Other Consumer

Report the provision for loan and lease losses for all other consumer loans, as defined in items 31, 32, 33 and 34.

Line item 112 All Other Loans and Leases

Report the provision for loan and lease losses for all other loans and leases, as defined in items 36, 37, 38, 39, 41 and 42.

Line item 113 Unallocated

Report any unallocated portion of the provision for loan and lease losses.

Line item 114 Total Net charge-offs during the quarter

Report charge-offs net of recoveries during the quarter, as defined in the FR Y-9C, Schedule HI-B, Part I, item 9, Column A minus Column B. This item is derived as the sum of items 114a-d.

Institutions that have not adopted ASU 2016-13 should report net charge-offs during the quarter in line item 114a. Institutions that have adopted ASU 2016-13 should report net charge-offs during the quarter on loans and leases, held-to-maturity, available-for-sale debt securities, and all other financial assets in item 114a, 114b, 114c, and 114d respectively.

Line item 114a Net charge-offs during the quarter on loans and leases

Report charge-offs net of recoveries during the quarter, as defined in the FR Y-9C, Schedule HI-B, Part II, Column A, item 3 minus item 2. .

Line item 114b Net charge-offs during the quarter on held-to-maturity debt securities

Report charge-offs net of recoveries during the quarter on held-to-maturity debt securities, as defined in the FR Y-9C, Schedule HI-B, Part II, Column B, item 3 minus item 2.

Line item 114c Net charge-offs during the quarter on available-for-sale debt securities

Report charge-offs net of recoveries during the quarter on available-for-sale debt securities, as defined in the FR Y-9C, Schedule HI-B, Part II, Column C, item 3 minus item 2.

Line item 114d Net charge-offs during the quarter on all other financial assets

Report charge-offs net of recoveries during the quarter on all other financial assets not included in items 114a-c above.

Line item 115 Total Other ALLL Changes

This item is derived as the sum of items 115a-d.

DRAFT

Institutions that have not adopted ASU 2016-13 should report other allowances in line item 115a. Institutions that have adopted ASU 2016-13 should report other allowances for credit losses on loans and leases, other allowances for credit losses on held-to-maturity debt securities, available-for-sale debt securities, and all other financial assets in item 115a, 115b, 115c, and 115d respectively.

Line item 115a Other ALLL Changes

Report other changes to the allowance for loan and lease losses, as defined in the FR Y-9C, Schedule HI-B, Part II, column A, item 6, minus item 4.

Line item 115b Other allowances for credit losses changes on held-to-maturity debt securities

Report other changes to the allowance for credit losses on held-to-maturity debt securities, as defined in the FR Y-9C, Schedule HI-B, Part II, column B, item 6, minus item 4.

Line item 115c Other allowances for credit losses changes on available-for-sale debt securities

Report other changes to the allowance for credit losses on available-for-sale debt securities, as defined in the FR Y-9C, Schedule HI-B, Part II, column C, item 6, minus item 4.

Line item 115d Other allowances for credit losses changes on all other financial assets

Report other changes to the allowance for credit losses on all other financial assets not included in items 115a-c above.

Line item 116 Total Allowances, current quarter

This item is derived as the sum of items 116a-d.

Institutions that have not adopted ASU 2016-13 should report total allowances in line item 116a. Institutions that have adopted ASU 2016-13 should report total allowances for credit losses on loans and leases, other allowances for credit losses on held-to-maturity debt securities, available-for-sale debt securities, and all other financial assets in item 116a, 116b, 116c, and 116d respectively.

Line item 116a ALLL, current quarter

Report the sum of items 68a, 91a and 115a, minus item 114a.

Line item 116b Allowances for credit losses on held-to-maturity debt securities, current quarter

Report the sum of items 68b, 91b and 115b, minus item 114b.

Line item 116c Allowances for credit losses on available-for-sale debt securities, current quarter

Report the sum of items 68c, 91c and 115c, minus item 114c.

Line item 116d Allowances for credit losses on all other financial assets, current quarter

Report the sum of items 68d, 91d and 115d, minus item 114d.

Line items 117 through 120 PRE-PROVISION NET REVENUE (PPNR):

Line item 117 Net interest income

Line item 117 must equal item 13 on the PPNR Submission Sub-schedule.

DRAFT

Line item 118 Noninterest income

Line item 118 must equal item 26 on the PPNR Submission Sub-schedule.

Line item 119 Noninterest expense

Line item 119 must equal item 38 on the PPNR Submission Sub-schedule.

Line item 120 Pre-provision Net Revenue

Report the sum of items 117 and 118, minus item 119.

Line items 121 through 135 CONDENSED INCOME STATEMENT:**Line item 121 Pre-provision Net Revenue**

Report the value for item 120.

Line item 122 Provisions during the quarter

Report the value for item 91.

Line item 123 Total Trading and Counterparty Losses

Report the value for item 62.

Line item 124 Total Other Losses

Report the value for item 66.

Line item 125 Other Income Statement (I/S) Items

Report other income statement items that the institution chooses to disclose. Describe these items in the supporting documentation.

Line item 126 Realized Gains (Losses) on available-for-sale securities, including OTTI ¹⁶

Report realized gains (losses) on available-for-sale securities, as defined in the FR Y-9C, Schedule HI, item 6.b. For the projected quarters, this amount represents projected other-than-temporary impairment losses on available-for-sale securities and realized gains and losses on available-for-sale securities. Gains and losses from sales of available-for-sale securities, other than OTTI, should not be allowed unless there is an existing contractual or legal obligation to sell a security or a security has already been sold.

Line item 127a Realized Gains (Losses) on held-to-maturity securities, including OTTI

Report realized gains (losses) on held-to-maturity securities, as defined in the FR Y-9C, Schedule HI, item 6.a. For the projected quarters, this amount represents projected other-than-temporary impairment losses on held-to-maturity securities and realized gains and losses on held-to-maturity securities. Gains and losses from sales of held-to-maturity securities, other than OTTI, should not be allowed unless there is an existing contractual or legal obligation to sell a security or a security has already been sold.

Line Item 127b Unrealized holding gains (losses) on equity securities not held for trading

Report unrealized holding gains (losses) on equity securities not held for trading as defined in the FR Y-9C, Schedule HI, Item 8.b. This item is to be completed by holding companies that have adopted ASU

¹⁶ Institutions that have adopted ASU 2016-13 should not include OTTI in items 126 or 127.

DRAFT

2016-01, which includes provisions governing the accounting for investments in equity securities.

Line item 128 Income (loss) before applicable income taxes and discontinued operations

Report the sum of items 121, 125, 126, 127a, and 127b minus items 122, 123, and 124.

Line item 129 Applicable income taxes (foreign and domestic)

Report all applicable income taxes, both foreign and domestic, as defined in the FR Y-9C, Schedule HI, item 9.

Line item 130 Income (loss) before discontinued operations

Report the amount of item 128 minus item 129.

Line item 131 Discontinued Operations, net of income taxes

Report all discontinued operations, net of applicable income taxes, as defined in the FR Y-9C, Schedule HI, item 11.

Line item 132 Net income (loss) attributable to BHC or IHC or SLHC and minority interests

Report the sum of item 130 and item 131.

Line item 133 Net income (loss) attributable to minority interests

Report net income (loss) attributable to minority interests, as defined in the FR Y-9C, Schedule HI, item 13.

Line item 134 Net income (loss) attributable to BHC, SLHC or IHC

Report the amount of item 132 minus item 133.

Line item 135 Effective Tax Rate (%)

Report the amount of item 129 divided by item 128, multiplied by 100.

Line items 136 through 139 REPURCHASE RESERVE/LIABILITY FOR MORTGAGE REPS AND WARRANTIES:

Line item 136 Reserve, prior quarter

Report the amount of any reserve or accrued liability that was established in the prior quarter for losses related to sold or government-insured mortgage loans (first or second lien).

Line item 137 Provisions during the quarter

Report the amount of provisions during the quarter to the repurchase reserve/liability for mortgage representations and warranties.

Line item 138 Net charges during the quarter

Report the amount of net charges (charges less recoveries) during the quarter to the repurchase reserve/liability for mortgage representations and warranties. Losses charged to this reserve can occur through contractual repurchases, settlement agreement, or litigation loss, including losses related to claims under securities law or fraud claims.

Line item 139 Reserve, current quarter

Report the sum of items 136 and 137 minus item 138.

DRAFT

A.1.b—Balance Sheet

For each scenario used, input the loan balance projections in the various line items in this sub-schedule. Balance projections for loans held in the loans held for investment portfolio should be reported in the appropriate line items in the “Loans Held for Investment at Amortized Cost” and balances for held for sale or held for investment under the fair value option should be reported in the appropriate line items in the “Loans Held for Sale and Loans Accounted for Under the Fair Value Option” section. MDRM codes are provided within the ‘Notes’ column for many of the line items. When applicable, the definition of the BHC’s, IHC’s or SLHC’s projections should correlate to the definitions outlined by the corresponding MDRM code within the FR Y-9C report. Domestic refers to portfolios in the domestic US offices (as defined in the FR Y-9C report), and International refers to portfolios outside of the domestic US offices.

Explain any M&A and divestitures included and how they are funded (liabilities, asset sales, etc.)

Line items 1 through 3 SECURITIES

Line item 1 Held to Maturity (HTM)

Report the amount of held-to-maturity securities, as defined in the FR Y-9C, Schedule HC, item 2.a. ¹⁷

Line item 2a Available for Sale (AFS)

Report the amount of available-for-sale securities, as defined in the FR Y-9C, Schedule HC, item 2.b.

Line item 2b Equity securities with readily determinable fair values not held for trading

Report the amount of equity securities with readily determinable fair values not held for trading, as defined in the FR Y-9C, Schedule HC, item 2.c.

Line item 3 Total Securities

This item is a shaded cell and is derived from the sum of items 1, 2a and 2b.

Line item 4 Securitizations (investment grade)

Investment grade means that the entity to which the Board-regulated institution is exposed through a loan or security, or the reference entity with respect to a credit derivative, has adequate capacity to meet financial commitments for the projected life of the asset or exposure. Such an entity or reference entity has adequate capacity to meet financial commitments if the risk of its default is low and the full and timely repayment of principal and interest is expected.

Line item 5 Securitizations (non-investment grade)

Securitizations that do not meet the investment grade definition above.

Line items 6 through 51 TOTAL LOANS AND LEASES:

Line item 6 Real estate loans (in domestic offices)

This item is a shaded cell and is derived from the sum of items 7, 10, 13 and 19.

¹⁷ Institutions that have adopted ASU 2016-13 should report item 1, net of any applicable allowance for credit losses.

DRAFT

Line item 7 First lien mortgages (including HELOANS)

This item is a shaded cell and is derived from the sum of items 8 and 9.

Line item 8 First lien mortgages

Report loans secured by first liens on 1 to 4 family residential properties, excluding closed-end first lien home equity loans (reported in item 7).

Line item 9 First lien home equity loans (HELOANS)

Report all closed-end first lien home equity loans.

Line item 10 Second/junior lien mortgages

This item is a shaded cell and is derived from the sum of items 11 and 12.

Line item 11 Closed-end junior loans

Report all closed-end loans secured by junior (i.e., other than first) liens on 1 to 4 family residential properties, as defined in the FR Y-9C, Schedule HC-C, item 1.c.(2)(b).

Line item 12 Home equity lines of credit (HELOCS)

Report the amount outstanding under revolving, open-end lines of credit secured by 1 to 4 family residential properties, as defined in the FR Y-9C, Schedule HC-C, item 1.c.(1).

Line item 13 Commercial real estate (CRE) loans

This item is a shaded cell and is derived from the sum of items 14, 15, and 16.

Line item 14 Construction

Report construction, land development, and other land loans, as defined in the FR Y-9C, Schedule HC-C, items 1(a)(1) and 1(a)(2).

Line item 15 Multifamily

Report loans secured by multifamily (5 or more) residential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(d).

Line item 16 Nonfarm, non-residential

This item is a shaded cell and is derived from the sum of items 17 and 18.

Line item 17 Owner-occupied

Report loans secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(1).

Line item 18 Non-owner-occupied

Report nonfarm nonresidential real estate loans that are not secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(2).

Line item 19 Loans secured by farmland

Report all loans secured by farmland, as defined in the FR Y-9C, Schedule HC-C, item 1(b).

Line item 20 Real estate loans (Not in domestic offices)

DRAFT

This item is a shaded cell and is derived from the sum of items 21, 22, 23 and 29.

Line item 21 First lien mortgages (Not in domestic offices)

Report all closed-end loans secured by first liens on 1 to 4 family residential properties, not held in domestic offices.

Line item 22 Second/junior lien mortgages (Not in domestic offices)

Report all loans secured by second/junior (i.e., other than first) liens on 1 to 4 family residential properties, not held in domestic offices.

Line item 23 Commercial real estate (CRE) loans (Not in domestic offices)

This item is a shaded cell and is derived from the sum of items 24, 25, and 26.

Line item 24 Construction (Not in domestic offices)

Report construction, land development, and other land loans, as defined in the FR Y-9C, Schedule HC-C, items 1(a)(1) and 1(a)(2), not held in domestic offices.

Line item 25 Multifamily (Not in domestic offices)

Report loans secured by multifamily (5 or more) residential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(d), not held in domestic offices.

Line item 26 Nonfarm, non-residential (Not in domestic offices)

This item is a shaded cell and is derived from the sum of items 27 and 28.

Line item 27 Owner-occupied (Not in domestic offices)

Report loans secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(1), not held in domestic offices.

Line item 28 Non-owner-occupied (Not in domestic offices)

Report nonfarm nonresidential real estate loans that are not secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(2), not held in domestic offices.

Line item 29 Loans secured by farmland (Not in domestic offices)

Report all loans secured by farmland, as defined in the FR Y-9C, Schedule HC-C, item 1(b), not held in domestic offices.

Line item 30 C&I Loans

This item is a shaded cell and is derived from the sum of items 31, 32, 33 and 34.

Line item 31 C&I Graded

Report all graded commercial and industrial (C&I) loans. Report only loans “graded” or “rated” using the reporting entity’s commercial credit rating system, as it is defined in the reporting entity’s normal course of business. This includes domestic and international business and corporate credit card or charge card loans for which a commercially graded corporation is ultimately responsible for repayment of credit losses incurred.

Line item 32 Small Business (Scored/Delinquency Managed)

DRAFT

Report all "scored" or "delinquency managed" U.S. small business loans for which a commercial internal risk rating is not used or that uses a different scale than other corporate loans reported in the FR Y-9C, Schedule HC-C, items 2.a, 2.b, 3, 4.a, 4.b, 7, 9.a, 9.b.1, 9.b.2, 10.b, excluding corporate and small business credit card loans included in the FR Y-9C, Schedule HC-C, line 4.a.

Line item 33 Corporate Card

Report loans extended under corporate credit cards. Report at the control account level or the individual pay level (not at the sub-account level). Corporate cards include employer-sponsored credit cards for use by a company's employees. Exclude corporate card loans included in Line item 31 (C&I Graded Loans).

Line item 34 Business Card

Report loans extended under business credit cards. Business cards include small business credit card accounts where the loan is underwritten with the sole proprietor or primary business owner as applicant. Report at the control account level or the individual pay level (not at the sub-account level).

Line item 35 Credit Cards

This item is a shaded cell and is derived from the sum of items 36 and 37.

Line item 36 Charge Cards

Report loans extended under consumer general purpose or private label credit cards that have terms and conditions associated with a charge card. Instead of having a stated interest rate, charge cards have an annual fee and an interchange fee. Also customers must pay off the loan within the billing cycle, which is typically one month. General purpose charge cards are credit cards that can be used at a wide variety of merchants, including any who accept MasterCard, Visa, American Express or Discover credit cards. Include affinity, co-brand cards in this category, and student card if applicable. Private label charge cards are credit cards, also known as proprietary credit cards, tied to the retailer issuing the card and can only be used in that retailer's stores. Include oil & gas cards in this loan type, and student cards if applicable.

Line item 37 Bank Cards

Report loans extended under consumer general purpose or private label credit cards that have terms and conditions associated with a bank card. A bank card will have a stated interest rate and a minimum payment amount due within the billing cycle. General purpose bank cards are credit cards that can be used at a wide variety of merchants, including any who accept MasterCard, Visa, American Express or Discover credit cards. Include affinity, co-brand cards in this category, and student cards if applicable. Private label bank cards are credit cards, also known as proprietary credit cards, tied to the retailer issuing the card and can only be used in that retailer's stores. Include oil & gas cards in this loan type, and student cards if applicable.

Line item 38 Other Consumer

This item is a shaded cell and is derived from the sum of items 39, 40, 41 and 42.

Line item 39 Auto Loans

Report all auto loans, as defined in the FR Y-9C, Schedule HC-C, item 6(c).

Line item 40 Student Loans

Report all student loans.

DRAFT

Line item 41 Other (consumer) loans backed by securities (non-purpose lending)

Report other consumer loans that are backed by securities (i.e., non-purpose lending).

Line item 42 Other (consumer)

Report all other consumer loans not reported in items 39, 40 or 41.

Line item 43 Other Loans

This item is a shaded cell and is derived from the sum of items 44, 45, 46, 47 and 48.

Line item 44 Loans to Foreign Governments

Report all loans to foreign governments, as defined in the FR Y-9C, Schedule HC-C, item 7. Exclude loans to foreign governments included in Line item 32 (Small Business Loans).

Line item 45 Agricultural Loans

Report all agricultural loans, as defined in the FR Y-9C, Schedule HC-C, item 3. Exclude agricultural loans included in Line item 32 (Small Business Loans).

Line item 46 Loans for Purchasing or Carrying Securities (secured or unsecured)

Report all loans for purchasing or carrying securities (secured or unsecured), as defined in the FR Y-9C, Schedule HC-C, item 9.b.(1). Exclude loans for purchasing or carrying securities included in Line item 32 (Small Business Loans).

Line item 47 Loans to Depositories and Other Financial Institutions

Report all loans to depositories and other financial Institutions (secured or unsecured), as defined in the FR Y-9C, Schedule HC-C, items 2.a, 2.b, and 9.a. Exclude loans to depositories and other financial institutions included in Line item 32 (Small Business Loans).

Line item 48 All Other Loans and Leases

This item is a shaded cell and is derived from the sum of items 49 and 50.

Line item 49 All Other Loans (exclude consumer loans)

Report all other loans (excluding consumer loans), as defined in the FR Y-9C, Schedule HC-C, item 9.b.(2). Exclude all other loans included in Line item 32 (Small Business Loans).

Line item 50 All Other Leases

Report all other leases (excluding consumer leases), as defined in the FR Y-9C, Schedule HC-C, item 10.b. Exclude all other leases included in Line item 32 (Small Business Loans).

Line item 51 Total Loans and Leases

Report the sum of items 6, 20, 30, 35, 38 and 43.

Line items 52 through 94 LOANS HELD FOR INVESTMENT AT AMORTIZED COST:

Line item 52 Real estate loans (in domestic offices)

This item is a shaded cell and is derived from the sum of items 53, 56, 59 and 65.

Line item 53 First lien mortgages (including HELOANS)

DRAFT

This item is a shaded cell and is derived from the sum of items 54 and 55.

Line item 54 First lien mortgages

Report loans held for investment accounted for at amortized cost on all closed-end loans secured by first liens on 1 to 4 family residential properties, excluding closed-end first lien home equity loans (reported in item 53).

Line item 55 First lien home equity loans (HELOANS)

Report loans held for investment accounted for at amortized cost on all closed-end first lien home equity loans.

Line item 56 Second/junior lien mortgages

This item is a shaded cell and is derived from the sum of items 57 and 58.

Line item 57 Closed-end junior loans

Report loans held for investment accounted for at amortized cost on all closed-end loans secured by junior (i.e., other than first) liens on 1 to 4 family residential properties.

Line item 58 Home equity lines of credit (HELOCS)

Report loans held for investment accounted for at amortized cost on the amount outstanding under revolving, open-end lines of credit secured by 1 to 4 family residential properties.

Line item 59 Commercial real estate (CRE) loans

This item is a shaded cell and is derived from the sum of items 60, 61, and 62.

Line item 60 Construction

Report loans held for investment accounted for at amortized cost on construction, land development, and other land loans, as defined in the FR Y-9C, Schedule HC-C, items 1(a)(1) and 1(a)(2).

Line item 61 Multifamily

Report loans held for investment accounted for at amortized cost on loans secured by multifamily (5 or more) residential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(d).

Line item 62 Nonfarm, nonresidential

This item is a shaded cell and is derived from the sum of items 63 and 64.

Line item 63 Owner-occupied

Report loans held for investment accounted for at amortized cost on loans secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(1).

Line item 64 Non-owner-occupied

Report loans held for investment accounted for at amortized cost on nonfarm nonresidential real estate loans that are not secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(2).

Line item 65 Loans secured by farmland

Report loans held for investment accounted for at amortized cost on all loans secured by farmland, as

DRAFT

defined in the FR Y-9C, Schedule HC-C, item 1(b).

Line item 66 Real estate loans (Not in domestic offices)

This item is a shaded cell and is derived from the sum of items 67, 68, 69 and 75.

Line item 67 First lien mortgages (Not in domestic offices)

Report loans held for investment accounted for at amortized cost on all closed-end loans secured by first liens on 1 to 4 family residential properties, not held in domestic offices.

Line item 68 Second/junior lien mortgages (Not in domestic offices)

Report loans held for investment accounted for at amortized cost on all loans secured by second/junior (i.e., other than first) liens on 1 to 4 family residential properties, not held in domestic offices.

Line item 69 Commercial real estate (CRE) loans (Not in domestic offices)

This item is a shaded cell and is derived from the sum of items 70, 71, and 72.

Line item 70 Construction (Not in domestic offices)

Report loans held for investment accounted for at amortized cost on construction, land development, and other land loans, as defined in the FR Y-9C, Schedule HC-C, items 1(a)(1) and 1(a)(2), not held in domestic offices.

Line item 71 Multifamily (Not in domestic offices)

Report loans held for investment accounted for at amortized cost on loans secured by multifamily (5 or more) residential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(d), not held in domestic offices.

Line item 72 Nonfarm, nonresidential (Not in domestic offices)

This item is a shaded cell and is derived from the sum of items 73 and 74.

Line item 73 Owner-occupied (Not in domestic offices)

Report loans held for investment accounted for at amortized cost on loans secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(1), not held in domestic offices.

Line item 74 Non-owner-occupied (Not in domestic offices)

Report loans held for investment accounted for at amortized cost on nonfarm nonresidential real estate loans that are not secured by owner-occupied nonfarm nonresidential properties, as defined in the FR Y-9C, Schedule HC-C, item 1(e)(2), not held in domestic offices.

Line item 75 Loans secured by farmland (Not in domestic offices)

Report loans held for investment accounted for at amortized cost on all loans secured by farmland, as defined in the FR Y-9C, Schedule HC-C, item 1(b), not held in domestic offices.

Line item 76 C&I Loans

This item is a shaded cell and is derived from the sum of items 77, 78 and 79.

Line item 77 C&I Graded

DRAFT

Report loans held for investment accounted for at amortized cost on all graded commercial and industrial (C&I) loans. Report only loans "graded" or "rated" using the reporting entity's commercial credit rating system, as it is defined in the reporting entity's normal course of business. This includes domestic and international business and corporate credit card or charge card loans for which a commercially graded corporation is ultimately responsible for repayment of credit losses incurred.

Line item 78 Small Business (Scored/Delinquency Managed)

Report loans held for investment accounted for at amortized cost on small business loans. Report all "scored" or "delinquency managed" U.S. small business loans for which a commercial internal risk rating is not used or that uses a different scale than other corporate loans reported in the FR Y-9C, Schedule HC-C, items 2.a, 2.b, 3, 4.a, 4.b, 7, 9.a, 9.b.1, 9.b.2, 10.b, excluding corporate and small business credit card loans included in the FR Y-9C, Schedule HC-C, line 4.a.

Line item 79 Business and Corporate Card

Report loans held for investment accounted for at amortized cost on loans extended under business and corporate credit cards. Business cards include small business credit card accounts where the loan is underwritten with the sole proprietor or primary business owner as applicant. Report at the control account level or the individual pay level (not at the sub-account level). Corporate cards include employer-sponsored credit cards for use by a company's employees. Exclude corporate card or charge card loans included in Line item 77 (C&I Graded Loans).

Line item 80 Credit Cards

Report loans held for investment accounted for at amortized cost on loans extended under consumer general purpose or private label credit cards. General purpose credit cards are credit cards that can be used at a wide variety of merchants, including any who accept MasterCard, Visa, American Express or Discover credit cards. Include affinity, co-brand cards in this category, and student cards if applicable. Private label credit cards are credit cards, also known as proprietary credit cards, tied to the retailer issuing the card and can only be used in that retailer's stores. Include oil & gas cards in this loan type, and student cards if applicable.

Line item 81 Other Consumer

This item is a shaded cell and is derived from the sum of items 82, 83, 84 and 85.

Line item 82 Auto Loans

Report loans held for investment accounted for at amortized cost on auto loans, as defined in the FR Y-9C, Schedule HC-C, item 6(c).

Line item 83 Student Loans

Report loans held for investment accounted for at amortized cost on student loans.

Line item 84 Other (consumer) loans backed by securities (non-purpose lending)

Report loans held for investment accounted for at amortized cost on other consumer loans that are backed by securities (i.e., non-purpose lending).

Line item 85 Other (consumer)

Report loans held for investment accounted for at amortized cost on all other consumer loans not reported in items 82, 83 or 84.

DRAFT

Line item 86 Other Loans and Leases

This item is a shaded cell and is derived from the sum of items 87, 88, 89, 90 and 91.

Line item 87 Loans to Foreign Governments

Report loans held for investment accounted for at amortized cost on loans to foreign governments, as defined in the FR Y-9C, Schedule HC-C, item 7. Exclude loans to foreign governments included in Line item 78 (Small Business Loans).

Line item 88 Agricultural Loans

Report loans held for investment accounted for at amortized cost on agricultural loans, as defined in the FR Y-9C, Schedule HC-C, item 3. Exclude agricultural loans included in Line item 78 (Small Business Loans).

Line item 89 Loans for Purchasing or Carrying Securities (secured or unsecured)

Report loans held for investment accounted for at amortized cost on loans for purchasing or carrying securities (secured or unsecured), as defined in the FR Y-9C, Schedule HC-C, item 9.b.(1). Exclude loans for purchasing or carrying securities included in Line item 78 (Small Business Loans).

Line item 90 Loans to Depositories and Other Financial Institutions

Report loans held for investment accounted for at amortized cost on loans to depositories and other financial Institutions (secured or unsecured), as defined in the FR Y-9C, Schedule HC-C, items 2.a, 2.b, and 9.a. Exclude loans to depositories and other financial institutions included in Line item 78 (Small Business Loans).

Line item 91 All Other Loans and Leases

This item is a shaded cell and is derived from the sum of items 92 and 93.

Line item 92 All Other Loans (exclude consumer loans)

Report loans held for investment accounted for at amortized cost on all other loans (excluding consumer loans), as defined in the FR Y-9C, Schedule HC-C, item 9.b.(2). Exclude all other loans included in Line item 78 (Small Business Loans).

Line item 93 All Other Leases

Report loans held for investment accounted for at amortized cost on all other leases (excluding consumer leases), as defined in the FR Y-9C, Schedule HC-C, item 10.b. Exclude all other leases included in Line item 78 (Small Business Loans).

Line item 94 Total Loans and Leases

Report the sum of items 52, 66, 76, 80, 81 and 86.

Line items 95 through 111 HELD FOR SALE LOANS AND LOANS ACCOUNTED FOR UNDER THE FAIR VALUE OPTION:**Line item 95 Real estate loans (in domestic offices)**

This item is a shaded cell and is derived from the sum of items 96, 97, 98 and 99.

Line item 96 First Lien Mortgages

DRAFT

This item is a shaded cell and is derived as item 7 minus item 53.

Line item 97 Second/Junior Lien Mortgages

This item is a shaded cell and is derived as item 10 minus item 56.

Line item 98 Commercial real estate (CRE) loans

This item is a shaded cell and is derived as item 13 minus item 59.

Line item 99 Loans secured by farmland

This item is a shaded cell and is derived as item 19 minus item 65.

Line item 100 Real estate loans (not in domestic offices)

This item is a shaded cell and is derived from the sum of items 101, 102 and 103.

Line item 101 Residential Mortgages (not in domestic offices)

This item is a shaded cell and is derived as the sum of items 21 and 22 minus items 67 and 68.

Line item 102 Commercial real estate (CRE) loans (not in domestic offices)

This item is a shaded cell and is derived as item 23 minus item 69.

Line item 103 Loans secured by farmland (not in domestic offices)

This item is a shaded cell and is derived as item 29 minus item 75.

Line item 104 C&I Loans

This item is a shaded cell and is derived as item 30 minus item 76.

Line item 105 Credit Cards

This item is a shaded cell and is derived as item 35 minus item 80.

Line item 106 Other Consumer

This item is a shaded cell and is derived as item 38 minus item 81.

Line item 107 All Other Loans and Leases

This item is a shaded cell and is derived as item 43 minus item 86.

Line item 108 Total Loans and Leases Held for Sale and Loans and Leases Accounted for under the Fair Value Option

This item is a shaded cell and is derived from the sum of items 95, 100, 104, 105, 106 and 107.

Line item 109 Unearned Income on Loans

Report all unearned income on loans, as defined in the FR Y-9C, Schedule HC-C, item 11, Column A.

Line item 110 Allowance for Loan and Lease Losses¹⁸

This item is a shaded cell and is carried over from item 116a of the Income Statement Sub-schedule.

¹⁸ For institutions that have adopted ASU 2016-13, this item will represent the allowance for credit losses on loans and leases.

DRAFT

Line item 111 Loans and Leases (Held for Investment and Held for Sale) Net of Unearned Income and Allowance for Loan and Lease Losses¹⁹

This item is a shaded cell and is derived as item 51 minus items 109 and 110.

TRADING

Line item 112 Trading Assets

Report trading assets, as defined in the FR Y-9C, Schedule HC, item 5.

Line items 113 through 117 INTANGIBLES:

Line item 113 Goodwill

Report goodwill, as defined in the FR Y-9C, Schedule HC-M, Memoranda item 12(b).

Line item 114 Mortgage Servicing Rights

Report all mortgage servicing rights, as defined in the FR Y-9C, Schedule HC-M, item 12.a.

Line item 115 Not Applicable.

Line item 116 All Other Identifiable Intangible Assets

Report all other identifiable intangible assets, as defined in the FR Y-9C, Schedule HC-M, item 12.c.

Line item 117 Total Intangible Assets

This item is a shaded cell and is derived from the sum of items 113, 114, 115 and 116.

Line items 118 through 131 OTHER (Assets):

Line item 118 Cash and cash equivalent

Report cash and cash equivalent, as defined in the FR Y-9C, Schedule HC, items 1.a., 1.b.(1), 1.b.(2).

Line item 119 Federal Funds Sold

Report federal funds sold in domestic offices, as defined in the FR Y-9C, Schedule HC, item 3.a.

Line item 120 Securities Purchased under Agreements to Resell²⁰

Report securities purchased under agreements to resell, as defined in the FR Y-9C, Schedule HC, item 3.b.

Line item 121 Premises and Fixed Assets

Report all premises and fixed assets, as defined in the FR Y-9C, Schedule HC, item 6.

Line item 122 Other Real Estate Owned (OREO)

This item is a shaded cell and is derived from the sum of items 123, 124 and 125.

¹⁹ For institutions that have adopted ASU 2016-13, this item will be net of unearned income and allowance for credit losses on loans and leases.

²⁰ Institutions that have adopted ASU 2016-13 should report item 120 net of any applicable allowance for credit losses.

DRAFT

Line item 123 Commercial

Report the net book value of all other real estate owned in the form of, or for which the underlying real estate consists of, commercial real estate.

Line item 124 Residential

Report the net book value of all other real estate owned in the form of, or for which the underlying real estate consists of, residential real estate.

Line item 125 Farmland

Report the net book value of all other real estate owned in the form of, or for which the underlying real estate consists of, farmland.

Line item 126 Collateral Underlying Operating Leases for Which the Bank is the Lessor

This item is a shaded cell and is derived from the sum of items 127 and 128.

Line item 127 Autos

Report the carrying amount of automobiles rented to others under operating leases, net of accumulated depreciation. The amount reported should only reflect collateral rented under operating leases and should not include collateral subject to capital/financing type leases.

Line item 128 Other

Report the carrying amount of any equipment or other assets (other than automobiles) rented to others under operating leases, net of accumulated depreciation. The amount reported should only reflect collateral rented under operating leases and should not include collateral subject to capital/financing type leases.

Line item 129 Other assets²¹

Report all other assets, as defined in the FR Y-9C, Schedule HC, sum of items 8, 9 and 11, minus item 126 (above).

Line item 130 Total Other (assets)

This item is a shaded cell and is derived from the sum of items 118-122, 126, and 129.

Line item 131 Total Assets

This item is a shaded cell and is derived from the sum of items 3, 111, 112, 117 and 130.

Line items 132 through 142 LIABILITIES:**Line item 132 Deposits in Domestic Offices**

Report all deposits in domestic offices, as defined in the FR Y-9C, Schedule HC, items 13.a.(1) and 13.a.(2).

Line item 133 Deposits in Foreign Offices

Report all deposits in foreign offices, as defined in the FR Y-9C, Schedule HC, items 13.b.(1) and

²¹ Institutions that have adopted ASU 2016-13 should report item 129 net of any applicable allowance for credit losses.

DRAFT

13.b.(2).

Line item 134 Deposits

This item is a shaded cell and derived from the sum of items 132 and 133.

Line item 135 Federal Funds Purchased and Repurchase Agreements

Report all federal funds purchased and repurchase agreements, as defined in the FR Y-9C, Schedule HC, items 14.a and 14.b.

Line item 136 Trading Liabilities

Report all trading liabilities, as defined in the FR Y-9C, Schedule HC, item 15.

Line item 137 Other Borrowed Money

Report other borrowed money, as defined in the FR Y-9C, Schedule HC, item 16.

Line item 138 Subordinated Notes and Debentures

Report subordinated notes and debentures, as defined in the FR Y-9C, Schedule HC, item 19.a.

Line item 139 Subordinated Notes Payable to Unconsolidated Trusts Issuing TruPS and TruPS Issued by Consolidated Special Purpose Entities

Report all subordinated notes payable to unconsolidated trusts issuing trust preferred securities, and trust preferred securities issued by consolidated special purpose entities, as defined in the FR Y-9C, Schedule HC, item 19.b.

Line item 140 Other liabilities

Report other liabilities, as defined in the FR Y-9C, Schedule HC, item 20.

Line item 141 Memo: Allowance for off-balance sheet credit exposures

Report the allowance for off-balance sheet credit exposures, as defined in the FR Y-9C, Schedule HC-G, item 3.

Line item 142 Total Liabilities

Report the sum of items 134 through 140.

Line items 143 through 151 EQUITY CAPITAL:

Line item 143 Perpetual Preferred Stock and Related Surplus

Report all perpetual preferred stock and related surplus, as defined in the FR Y-9C, Schedule HC, item 23.

Line item 144 Common Stock (Par Value)

Report the par value of common stock, as defined in the FR Y-9C, Schedule HC, item 24.

Line item 145 Surplus (Exclude All Surplus Related to Preferred Stock)

Report surplus (excluding surplus related to preferred stock), as defined in the FR Y-9C, Schedule HC, item 25.

Line item 146 Retained Earnings

DRAFT

Report all retained earnings, as defined in the FR Y-9C, Schedule HC, item 26.a.

Line item 147 Accumulated Other Comprehensive Income (AOCI)

Report accumulated other comprehensive income (AOCI), as defined in the FR Y-9C, Schedule HC, item 26.b.

Line item 148 Other Equity Capital Components

Report other equity capital components, as defined in the FR Y-9C, Schedule HC, item 26.c.

Line item 149 Total BHC, IHC or SLHC Equity Capital

Report the sum of items 143 through 148.

Line item 150 Noncontrolling (Minority) Interests in Consolidated Subsidiaries

Report all noncontrolling (minority) interests in consolidated subsidiaries, as defined in the FR Y-9C, Schedule HC, item 27.b.

Line item 151 Total Equity Capital

Report the sum of items 149 and 150.

Line item 152 Unused Commercial Lending Commitments and Letters of Credit

Report all unused commercial lending commitments and letters of credit, as defined in the FR Y-9C, Schedule HC-L, items 1.c.(1), 1.c.(2), 1.e.(1), 1.e.(2), 1.e.(3), 2, 3, and 4.

DRAFT

A.1.c—Risk-Weighted Assets (RWA)

A.1.c.1—Standardized RWA

All BHCs, IHCs and SLHCs are required to complete the “Standardized RWA” sub-schedule.

For reporting quarters starting January 1, 2018, advanced approaches firms must apply a 250 percent risk-weight to mortgage servicing assets (MSAs), deferred tax assets arising from temporary differences that could not be realized through net operating loss carrybacks, and significant investments in the capital of unconsolidated financial institutions in the form of common stock that are not deducted from capital. For all reporting quarters, a non-advanced approaches firm must apply a 100 percent risk weight to any amounts of MSAs, deferred tax assets arising from temporary differences that could not be realized through net operating loss carrybacks, and significant investments in the capital of unconsolidated financial institutions in the form of common stock that are not deducted from capital, and continue to apply the 2017 risk weights under the capital rules to amounts of non-significant investments in the capital of unconsolidated financial institutions and significant investments in the capital of unconsolidated financial institution not in the form of common stock that are not deducted from capital.

BHCs, SLHCs and IHCs that are subject to market risk capital requirements at the as of date are required to complete the market risk-weighted asset section within the sub-schedule. However, if a BHC, SLHC, or IHC projects to meet the trading activity threshold that would require it to be subject to the market risk capital requirements during the forecast period, then the BHC, SLHC or IHC should complete the market risk-weighted asset section within the sub-schedule. Please refer to 78 Federal Register 62250, October 11, 2013 and 78 Federal Register 76521, December 18, 2013 for details of the requirements.

Standardized Approach Credit Risk

Line item 1 Cash and balances due from depository institutions

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 1.

Securities (excluding securitizations)

Line item 2a Held-to-maturity:

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 2a.

Line item 2b Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading:

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 2b.

Line item 3 Federal funds sold

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 3a.

DRAFT

Loans and leases on held for sale

Line item 4a Residential mortgage exposures

Report the risk-weighted asset amount consistent with the definition for the FR Y-9C, Part II, Line item 4a.

Line item 4b High Volatility Commercial Real Estate

Report the risk-weighted amount consistent with the definition for the FR Y-9C, HC-R, Part II, Line item 4b.

Line item 4c Exposures past due 90 days or more or on nonaccrual

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line item 4c.

Line item 4d All other exposures

Report the risk-weighted asset amount consistent with the definition for the FR Y-9C, HC-R, Part II, Line item 4d.

Loans and leases, net of unearned income

Line item 5a Residential mortgage exposures

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 5a.

Line item 5b High Volatility Commercial Real Estate

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 5b.

Line item 5c Exposures past due exposures 90 days or more or on nonaccrual

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 5c.

Line item 5d All other exposures

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 5d.

Line item 6 Trading assets (excluding securitizations that receive standardized charges)

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 7.

Line item 7a All other assets

Report the risk-weighted asset amount consistent with the definition of FR Y-9C, HC-R, Part II, line item 8.

Line item 7b Separate account bank-owned life insurance

Report the risk-weighted asset amount consistent with the definition of FR Y-9C, HC-R, Part II, line item 8a.

Line item 7c Default fund contributions to central counterparties

Report the risk-weighted asset amount consistent with the definition of FR Y-9C, HC-R, Part II, line

DRAFT

item 8b.

On-balance sheet securitization exposures

Line item 8a Held-to-maturity

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 9a.

Line item 8b Available-for-sale

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 9b.

Line item 8c Trading assets that that receive standardized charges

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 9c.

Line item 8d All other on-balance sheet securitization exposures

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 9d.

Line item 9 Off-balance sheet securitization exposures

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 10.

Line item 10 RWA for Balance Sheet Asset Categories (sum of items 1 through 8d)

This item is shaded and is derived from other items in the schedule, no input required.

Derivatives and Off-Balance Sheet Items

Line item 11 Financial standby letters of credit

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 12.

Line item 12 Performance standby letters of credit and transaction related contingent items

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 13.

Line item 13 Commercial and similar letters of credit with an original maturity of one year or less

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 14.

Line item 14 Retained recourse on small business obligations sold with recourse

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 15.

Line item 15 Repo-style transactions

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 16.

DRAFT

Line item 16 All other off-balance sheet liabilities

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 17.

Line item 17a Unused commitments: Original maturity of one year or less, excluding ABCP conduits

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 18a.

Line item 17b Unused commitments: Original maturity of one year or less to ABCP conduits

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 18b.

Line item 17c Unused commitments: Original maturity exceeding one year

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 18c.

Line item 18 Unconditionally cancelable commitment

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 19.

Line item 19 Over-the-counter derivatives

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 20.

Line item 20 Centrally cleared derivatives

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 21.

Line item 21 Unsettled transactions (failed trades)

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 22.

Line item 22 RWA for Assets, Derivatives and Off-Balance-Sheet Asset Categories

This item is a shaded cell and is derived from the sum of items 9 through 21.

Line item 23 RWA for purposes of calculating the allowance for loan and lease losses (ALLL) 1.25 percent threshold

Report the risk-weighted asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 26.

Market Risk

Line items 24 through 40 are applicable only to BHCs, SLHCs and IHCs that are subject to the market risk capital rule. If a BHC, SLHC or IHC does not have a particular portfolio or no trading book at all, risk-weighted assets should be reported as 0.

Line item 24 Value-at-risk (VaR) with Multiplier

Report the risk-weighted amount consistent with the definition for FFIEC 102 Line Item 4.

DRAFT

Line item 25 Stressed VaR with Multiplier

Report the risk-weighted amount consistent with the definition for FFIEC 102 Line Item 7.

Specific risk add-on**Line item 26 Debt Positions**

Report the risk-weighted amount consistent with the definition for FFIEC 102 Line Item 8

Line item 27 Equity positions

Report the risk-weighted amount consistent with the definition of FFIEC 102 Line Item 9.

Line item 28 Capital requirements for securitization positions using the Simplified Supervisory Formula Approach (SSFA) or applying a specific risk-weighting factor of 1250 percent.

Report the risk-weighted amount consistent with the definition of FFIEC 102 Line Item 10.

Line item 29 Standardized measure of specific risk add-ons (sum of items 26, 27, and 28)

This item is the derived sum of line item 26, 27, and 28. The risk-weighted amount should be consistent with the definition for the FFIEC 102 Line item 14.

Item 30 is not applicable to an institution that does not calculate a modeled measure of incremental risk.**Line item 30 Incremental risk charge requirement**

Report the risk-weighted amount consistent with the definition for FFIEC 102 Line Item 18.

Line item 31 Modeled comprehensive risk measure

Report the risk-weighted amount consistent with the definition for FFIEC 102 Line Item 19.

Line item 32 Standardized measure of specific risk add-ons for net long correlation trading positions

Report the risk-weighted amount consistent with the definition of FFIEC 102 Line Item 26.

Line item 33 Standardized measure of specific risk add-ons for net short correlation trading positions

Report the risk-weighted amount consistent with the definition of FFIEC 102 Line Item 34

Line item 34 Standardized measure of specific risk add-ons (greater of item 32 or 33)

This item is derived as the greater of Line Item 32 or 33.

Line item 35 Surcharge for modeled correlation trading positions (item 34 multiplied by 0.08)

This item is derived as product of line item 34 multiplied by 0.08. This item should be consistent with the risk-weighted amount for FFIEC 102 Line Item 37.

Line item 36 Comprehensive risk capital measure requirement

Report the risk-weighted amount consistent with the definition for FFIEC 102 Line Item 42. Only if a BHC, SLHC or IHC has received supervisory approval of its comprehensive risk model effectiveness, report the risk-weighted asset amount consistent with the definition for FFIEC 102 Line Item 48.

De minimis positions and other adjustments

DRAFT

Line item 37 Capital requirement for all de minimis exposures

Report the risk-weighted amount consistent with the definition of FFIEC 102 Line Item 52

Line item 38 Additional capital requirement

Report the risk-weighted amount consistent with the definition of FFIEC 102 Line Item 53.

Line item 39 Sum of items 37 and 38

This item is derived as sum of item 37 and item 38. The risk-weighted amount should be consistent with the definition of FFIEC 102 Line Item 54.

Market risk-weighted assets**Line item 40 Standardized market risk-weighted assets: Sum of items 24, 25, 29, 30 (if applicable), 36 (if applicable), and 39**

This item is derived as the sum of items 24, 25, 29, 30 (if applicable), 36 (if applicable), and 39.

Line item 41 Risk-weighted assets before deductions for excess allowance of loan and lease losses and allocated risk transfer risk reserve

This item is a shaded cell and is derived from the sum of items 22 and 40.

Line item 42 Less: Excess allowance for loan and lease losses

Report the asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 29.

Line item 43 Less: Allocated transfer risk reserve

Report the asset amount consistent with the definition for FR Y-9C, HC-R, Part II, Line Item 30.

Line item 44 Total risk-weighted assets

This item is a shaded cell and is derived from item 41 minus the sum of items 42 and 43.

Memoranda Items – Derivatives

Report all memoranda items lines 45 through 48g.

Line item 45 Current credit exposure across all derivative contracts covered by the regulatory capital rules

Report the total current credit exposure amount for all interest rate, foreign exchange rate and gold, credit (investment grade reference assets), credit (non-investment grade reference assets), equity, precious metals (except gold), and other derivative contracts covered by the regulatory capital rules after considering applicable legally enforceable bilateral netting agreements. Banking organizations that are subject to Subpart F of the regulatory capital rules should exclude all covered positions subject to these guidelines, except for foreign exchange derivatives that are outside of the trading account. Foreign exchange derivatives that are outside of the trading account and all OTC derivatives continue to have a counterparty credit risk capital charge and, therefore, a current credit exposure amount for these derivatives should be reported in this item.

Line item 46 Notional principal amounts of over-the-counter derivative contracts

This item is a shaded cell and is derived from the sum of lines 47a through 47g.

Report in the appropriate sub-item the notional amount or par value of all OTC derivative contracts, including credit derivatives that are subject to the regulatory capital rules. Such contracts include

DRAFT

swaps, forwards, and purchased options.

Line item 47a Interest rate

Report interest rate contracts that are subject to the regulatory capital rules.

Line item 47b Foreign exchange rate and gold

Report foreign exchange contracts and the remaining maturities of gold contracts that are subject to the regulatory capital rules.

Line item 47c Credit (investment grade reference asset)

Report credit derivative contracts where the reference entity meets the definition of investment grade as described in 12 CFR 217.2 of the regulatory capital rule.

Line item 47d Credit (non-investment grade reference asset)

Report credit derivative contracts where the reference entity does not meet the definition of investment grade as described in 12 CFR 217.2 of the regulatory capital rule.

Line item 47e Equity

Report equity derivative contracts that are subject to the regulatory capital rules.

Line item 47f Precious metals (except gold)

Report other precious metals contracts that are subject to the regulatory capital rules. Report all silver, platinum, and palladium contracts.

Line item 47g Other

Report other contracts that are subject to the regulatory capital rules. For contracts with multiple exchanges of principal, notional amount is determined by multiplying the contractual amount by the number of remaining payments (e.g., changes of principal) in the derivative contract.

Line item 48 Notional principal amounts of centrally cleared derivative contracts

This item is a shaded cell and is derived from the sum of lines 48a through 48g.

Report in the appropriate sub-item the notional amount or par value of all centrally cleared derivative contracts, including credit derivatives that are subject to the regulatory capital rules. Such contracts include swaps, forwards, and purchased options.

Line item 49a Interest rate

Report interest rate contracts that are subject to the regulatory capital rules.

Line item 49b Foreign exchange rate and gold

Report foreign exchange contracts and the remaining maturities of gold contracts that are subject to the regulatory capital rules.

Line item 49c Credit (investment grade reference asset)

Report credit derivative contracts where the reference entity meets the definition of investment grade as described in 12 CFR 217.2 of the regulatory capital rule.

Line item 49d Credit (non-investment grade reference asset)

Report credit derivative contracts where the reference entity does not meet the definition of investment grade as described in 12 CFR 217.2 of the regulatory capital rule.

DRAFT

Line item 49e Equity

Report equity derivative contracts that are subject to the regulatory capital rules.

Line item 49f Precious metals (except gold)

Report other precious metals contracts that are subject to the regulatory capital rules. Report all silver, platinum, and palladium contracts.

Line item 49g Other

Report other contracts that are subject to the regulatory capital rules. For contracts with multiple exchanges of principal, notional amount is determined by multiplying the contractual amount by the number of remaining payments (e.g., changes of principal) in the derivative contract.

A.1.c.2—Advanced RWA

Please note that for purposes of CCAR 2019, BHCs, IHCs and SLHCs are NOT required to fill out the “Advanced RWA” sub-schedule. Large and noncomplex firms are not required to complete this subschedule.

BHCs, SLHCs and IHCs subject to subpart E of the regulatory capital rule that have exited the parallel run process and that have received notification from its primary Federal supervisor under section 121(d) of the advanced approaches rule are required to complete the “Advanced RWA” sub-schedule.

MDRM codes have been included in the sub-schedule (column C) and correspond to the definitions for the FFIEC 101 line items where applicable.

BHCs, SLHCs and IHCs that are subject to market risk capital requirements at the as of date are required to complete the market risk-weighted asset section within the sub-schedule. However, if a BHC, SLHC or IHC projects to meet the trading activity threshold that would require it to be subject to the market risk capital requirements during the forecast period, then the BHC, SLHC or IHC should complete the market risk-weighted asset section within the sub-schedule. Please refer to the final market risk capital rule released by the U.S. banking agencies (77 Federal Register 53060, August 30, 2012) for details of the requirements of the rule.

Advanced Approaches Credit Risk (Including CCR and non-trading credit risk), with 1.06 scaling factor and Operational Risk

Line items 1 through 57: Advanced Approaches Credit Risk (Including CCR and non-trading credit risk), with 1.06 scaling factor and Operational Risk

Line item 1 Advanced Approaches Credit RWA

This item is a shaded cell and is derived from sum of items 2, 13, 20, 47, 49, 55 32 or 33, and 40 if greater than 0 or 50 if greater than zero.

Line items 2 through 57 Various

Definition of the BHC’s or IHC’s or SLHC’s projections should correlate to the definitions outlined by the corresponding MDRM code (shown in column C) of the FFIEC 101 report per the current advanced approaches capital rules (72 Federal Register 69288, December 7, 2007) .

DRAFT

Market Risk

If a BHC, SLHC or IHC does not have a particular portfolio or no trading book at all, risk-weighted assets should be reported as 0.

For items 58 through 73, refer to instructions for items 12 through 30, respectively, for market risk under the “General RWA” sub-schedule.

Line item 74 Other RWA

If the BHC, SLHC or IHC is unable to assign RWA to one of the above categories, even on a best-efforts basis, they should be reported in this line.

Line item 75 Excess eligible credit reserves not included in tier 2 capital

Include excess eligible credit reserves not included in tier 2 capital, consistent with the current advanced approaches capital rules (72 Federal Register 69288, December 7, 2007).

Line item 76 Total RWA

This item is a shaded cell and is derived from sum of items 1, 56, 73, 74 minus item 75.

A.1.d—Capital

The Capital – CCAR and Capital – DFAST sub-schedules collect projections of the main drivers of equity capital and the key components of the regulatory capital schedule. MDRM codes are provided in the ‘Notes’ column for many of the line items.

A BHC or IHC should consult the CCAR Instructions and the capital plan rule (12 CFR 225.8) for information regarding the capital action assumptions to use in completing the Capital – CCAR sub-schedule. A BHC or IHC should consult the CCAR instructions and the covered company company-run stress test rule (12 CFR 252.56(b)) for information regarding the capital action assumptions to use in completing the Capital – DFAST sub-schedule. A SLHC should consult the savings and loan holding company company-run stress test rule (found in 12 CFR part 238) for information regarding the capital action assumptions to use in completing the Capital – DFAST sub-schedule. Firms must reflect the impact of the global market shock on items subject to adjustment or deduction in capital. If a firm adjusts its projection of an item to reflect the impact of the global market shock, it must also report an adjusted starting value that reflects the global market shock.

All data collected in the Capital sub-schedules should be reported on a quarterly basis and not on a year-to-date, cumulative basis. Note that line item 115, Common shares outstanding, should be reported in millions of shares.

All BHCs, SLHCs and IHCs are required to provide projections of common equity tier 1 capital, tier 1 capital, and total capital based on the revised regulatory capital rule for all quarters.

All advanced approaches BHCs, SLHCs and IHCs are required to provide projections of common equity tier 1 capital, tier 1 capital, and total capital based on the revised regulatory capital rule for all quarters. For reporting quarters starting January 1, 2018, a non-advanced approaches firm must continue to apply, indefinitely, the risk weight and the deduction treatment applicable during 2017 –

DRAFT

in accordance with relevant transition provisions for 2017 in section 300 of the capital rules – for MSAs, deferred tax assets arising from temporary differences that could not be realized through net operating loss carrybacks, significant investments in the capital of unconsolidated financial institutions in the form of common stock, non-significant investments in the capital of unconsolidated financial institutions, and significant investments in the capital of unconsolidated financial institutions that are not in the form of common stock.

Under the Board’s capital plan and stress test rules, a BHC’s, SLHC’s or IHC’s calculations of pro forma regulatory capital ratios over the planning horizon shall not include estimates using the advanced approaches (See 12 CFR 225.8(b)(3)(i), 12 CFR part 238, 12 CFR 252.43(d)(1), and 12 CFR 252.53(d)(1)). Accordingly, for actual and projected line items on the FR Y-14A Summary Schedule Capital – CCAR and Capital – DFAST sub-schedules, BHCs, SLHCs and IHCs should not use the advanced approaches. For example, in line item 34, “All other deductions from (additions to) common equity tier 1 capital before threshold-based deductions,” an advanced approaches BHC or SLHC should not include expected credit losses that exceed the eligible credit reserves.

Beginning with the 2020 stress test cycle, a firm that has adopted CECL will be required to include its provision for credit losses, which would include provisions calculated under ASU 2016-13, instead of its provision for loan and lease losses, for all quarters. Additionally, any firm that opts to phase in the the day-one adverse effects of the adoption of current expected credit loss methodology on regulatory capital over a three-year period must reflect that in that its projections.

The projections should clearly show any proposed capital distributions or other scenario-dependent actions that would affect the BHC’s, SLHC’s or IHC’s regulatory capital, including any assumptions required under the Board's regulations.

SCHEDULE HI-A—CHANGES IN BANK OR INTERMEDIATE HOLDING COMPANY EQUITY CAPITAL

Line items 1 through 17: ITEMS RELATED TO SCHEDULE HI-A—CHANGES IN BANK OR INTERMEDIATE HOLDING COMPANY EQUITY CAPITAL

Line item 1 Total bank or intermediate holding company equity capital most recently reported for the end of previous QUARTER

Report total bank or intermediate holding company equity capital most recently reported for the end of previous quarter, as defined in FR Y-9C, Schedule HI-A, line item 1 (except FR Y-9C, Schedule HI-A, line item 1, is reported for the end of the previous calendar year).

Line item 2 Effect of changes in accounting principles and corrections of material accounting errors

Report the effect of changes in accounting principles and corrections of material accounting errors, as defined in FR Y-9C, Schedule HI-A, line item 2.

Line item 3 Balance end of previous QUARTER as restated

This item is derived as the sum of line items 1 and 2, as defined in FR Y-9C, schedule HI-A, line item 3.

Line item 4 Net Income (loss) attributable to bank or intermediate holding company

Report net income (loss) attributable to bank or intermediate holding company, as defined in FR Y-9C, Schedule HI-A, line item 4.

DRAFT

Line item 5 Sale of perpetual preferred stock, gross

Report the sale of perpetual preferred stock, gross, as defined in FR Y-9C, Schedule HI-A, line item 5.a.

Line item 6 Conversion or retirement of perpetual preferred stock

Report the conversion or retirement of perpetual preferred stock, as defined in FR Y-9C, Schedule HI-A, line item 5.b.

Line item 7 Sale of common stock, gross

Report the sale of common stock, gross, as defined in FR Y-9C, Schedule HI-A, line item 6.a.

Line item 8 Conversion or retirement of common stock

Report the conversion or retirement of common stock, as defined in FR Y-9C, Schedule HI-A, line item 6.b. Note: increases and decreases in additional paid in capital (APIC) attributable to the amortization of employee stock compensation and any changes in APIC, or common stock as a result of the actual issuance of common stock for the employee stock compensation should be captured in this line item.

Line item 9 Sale of treasury stock

Report the sale of treasury stock, as defined in FR Y-9C, Schedule HI-A, line item 7.

Line item 10 Purchase of treasury stock

Report the purchase of treasury stock, as defined in FR Y-9C, Schedule HI-A, line item 8.

Line item 11 Changes incident to business combinations, net

Report the changes incident to business combinations, net, as defined in FR Y-9C, Schedule HI-A, line item 9.

Line item 12 Cash dividends declared on preferred stock

Report cash dividends declared on preferred stock, as defined in FR Y-9C, Schedule HI-A, line item 10.

Line item 13 Cash dividends declared on common stock

Report cash dividends declared on common stock, as defined in FR Y-9C, Schedule HI-A, line item 11.

Line item 14 Other comprehensive income

Report other comprehensive income, as defined in FR Y-9C, Schedule HI-A, line item 12.

Line item 15 Change in the offsetting debit to the liability for Employee Stock Ownership Plan (ESOP) debt guaranteed by the bank or intermediate holding company

Report the change in the offsetting debit to the liability for Employee Stock Ownership Plan (ESOP) debt guaranteed by the bank or intermediate holding company, as defined in FR Y-9C, Schedule HI-A, line item 13.

Line item 16 Other adjustments to equity capital (not included above)

Report other adjustments to equity capital, not included above, as defined in FR Y-9C, Schedule HI-A, line item 14. Report amounts separately and provide a text explanation of each type of adjustment to equity capital included in this line item in item Memoranda 1 (line item 125) at the end of this sub-schedule. Note: increases and decreases in additional paid in capital (APIC) attributable to the amortization of employee stock compensation and any changes in APIC, treasury or common stock as a result of the actual issuance of common stock for the employee stock compensation should not be

DRAFT

captured in this line item, instead the impact should be captured in line items 7, 8, 9, and/or 10 as appropriate.

Line item 17 Total bank or intermediate holding company equity capital end of current period

This line item is a shaded cell and is derived from the sum of line items 3, 4, 5, 6, 7, 8, 9, 11, 14, 15 and 16, less line items 10, 12 and 13. Note that this line item should correspond to the definition in FR Y-9C, Schedule HC, line item 27a.

Regulatory Capital per Regulatory Capital Rule

All advanced approaches BHCs and IHCs and SLHCs and opt-in BHCs and IHCs and SLHCs must complete the following section. Where applicable, please reflect the transition provisions for the appropriate line item.²²

Line item 18 AOCI opt-out election

A holding company that is not an advanced approaches holding company may make a one-time election to opt-out of the requirement to include most components of AOCI in common equity tier 1 capital (with the exception of accumulated net gains and losses on cash flow hedges related to items that are not recognized at fair value on the balance sheet). A holding company that makes an AOCI opt-out election must enter “1” for “Yes” in line item 18. There are no transition provisions applicable to reporting line item 21, if a holding company makes an AOCI opt-out election.

A holding company (except an advanced approaches holding company) must make its AOCI opt-out election on the holding company’s March 31, 2015 FR Y-9C report. For a holding company that comes into existence after March 31, 2015, the holding company must make its AOCI opt-out election on the holding company’s first FR Y-9C report. After a holding company initially makes its AOCI opt-out election, the holding company must report its election in each Y-14A report thereafter. With prior notice to the Federal Reserve, a holding company resulting from a merger, acquisition, or purchase transaction may make a new AOCI opt-out election, as described in section 22(b)(2) of the regulatory capital rules.

Common Equity Tier 1

Line item 19 Common stock and related surplus, net of treasury stock and unearned employee stock ownership plan (ESOP) shares

Report the amount of common stock and related surplus as defined in FR Y-9C, Schedule HC-R, part I, line item 1.

Line item 20 Retained earnings

Report the amount of the holding company’s retained earnings as defined in FR Y-9C, Schedule HC-R, part I, line item 2.

Institutions that have adopted ASU 2016-13 and have elected to apply the CECL transition provision should include the applicable portion of the CECL transitional amount in this item.

²² See the regulatory capital rule published on November 21, 2017 (82 FR 55309).

DRAFT

Line item 21 Accumulated other comprehensive income (AOCI)

Report the amount of AOCI as defined in FR Y-9C, Schedule HC-R, part I, line item 3.

Line item 22 Common equity tier 1 minority interest includable in common equity tier 1 capital.

Report the amount of the holding company's common equity tier 1 minority interest includable in common equity tier 1 capital as defined in FR Y-9C, Schedule HC-R, part I, line item 4.

Line item 23 Common equity tier 1 capital before adjustments and deductions

This line item is a shaded cell and is derived from the sum of line items 19 through 22. This item should align with the definition in FR Y-9C, Schedule HC-R, part I, line item 5.

Common equity tier 1 capital: adjustments and deductions(where applicable, report all line items reflective of transition provisions)

Line item 24 Goodwill net of associated deferred tax liabilities (DTLs)

Report the amount of goodwill as defined in FR Y-9C, Schedule HC-R, part I, line item 6. Firms must reflect the impact of the global market shock on items subject to adjustment or deduction in capital. If a firm adjusts its projection of an item to reflect the impact of the global market shock, it must also report an adjusted starting value that reflects the global market shock.

Line item 25 Intangible assets (other than goodwill and mortgage servicing assets (MSAs)), net of associated DTLs

Report the amount of intangible assets as defined in FR Y-9C, Schedule HC-R, part I, line item 7.

Line item 26 Deferred Tax Assets (DTAs) that arise from net operating loss and tax credit carryforwards, net of any related valuation allowances and net of DTLs

Report the amount of DTAs as defined in FR Y-9C, Schedule HC-R, part I, line item 8.

AOCI-related adjustments

If Item 18 is "1" for "Yes", complete items 27 through 31 only for AOCI related adjustments.

Line item 27: AOCI related adjustments: Net unrealized gains (losses) on available-for-sale securities

Report the amount of net unrealized holding gains (losses) on available-for-sale securities, net of applicable taxes, as defined in FR Y-9C, Schedule HC-R, part I, line item 9a. If the amount is a net gain, report it as a positive value in this line item. If the amount is a net loss, report it as a negative value in this line item.

Line item 28: AOCI related adjustments: Net unrealized loss on available-for-sale preferred stock classified as an equity security under GAAP and available-for-sale equity exposures

Report as a positive value net unrealized loss on available-for-sale preferred stock classified as an equity security under GAAP and available-for-sale equity exposures as defined in FR Y-9C, Schedule HC-R, part I, line item 9b.

Line item 29: AOCI related adjustments: Accumulated net gains (losses) on cash flow hedges

Report the amount of accumulated net gains (losses) on cash flow hedges as defined in FR Y-9C, Schedule HC-R, part I, line item 9c. If the amount is a net gain, report it as a positive value in this line

DRAFT

item. If the amount is a net loss, report it as a negative value in this line item.

Line item 30: AOCI related adjustments: Amounts recorded in AOCI attributed to defined benefit postretirement plans resulting from the initial and subsequent application of the relevant GAAP standards that pertain to such plans

Report the amounts recorded in AOCI as defined in FR Y-9C, Schedule HC-R, part I, line item 9d, resulting from the initial and subsequent application of ASC Subtopic 715-20 (formerly FASB Statement No. 158, “Employers’ Accounting for Defined Benefit Pension and Other Postretirement Plans”) to defined benefit postretirement plans resulting from the initial and subsequent application of the relevant GAAP standards that pertain to such plans. A holding company may exclude this portion related to pension assets deducted in the line item above. If the amount is a net gain, report it as a positive value in this line item. If the amount is a net loss, report it as a negative value in this line item.

Line item 31: AOCI related adjustments: Net unrealized gains (losses) on held-to-maturity securities that are included in AOCI

Report the amount of net unrealized gains (losses) that are not credit-related on held-to-maturity securities and are included in AOCI as defined in FR Y-9C, Schedule HC-R, part I, item 9e. If the amount is a net gain, report it as a positive value. If the amount is a net loss, report it as a negative value.

If Item 18 is “0” for “No”, complete item 32 only for AOCI related adjustments.

Line item 32 Accumulated net gain (loss) on cash flow hedges included in AOCI, net of applicable tax effects that relate to the hedging of items that are not recognized at fair value on the balance sheet

Report the amount of accumulated net gain (loss) on cash flow hedges included in AOCI, net of applicable tax effects that relate to the hedging of items not recognized at fair value on the balance sheet, as defined in FR Y-9C, Schedule HC-R, part I, line item 9f. If the amount is a net gain, report it as a positive value. If the amount is a net loss, report it as a negative value.

Line item 33 Other deductions from (additions to) common equity tier 1 capital before threshold-based deductions: Unrealized net gain (loss) related to changes in the fair value of liabilities that are due to changes in own credit risk

Report the amount of unrealized net gain (loss) as defined in FR Y-9C, Schedule HC-R, part I, line item 10a. If the amount is a net gain, report it as a positive value in this line item. If the amount is a net loss, report it as a negative value in this line item.

Line item 34 Other deductions from (additions to) common equity tier 1 capital before threshold-based deductions: All other deductions from (additions to) common equity tier 1 capital before threshold-based deductions

Report the amount of other deductions from (additions to) common equity tier 1 capital as defined in FR Y-9C, Schedule HC-R, part I, line item 10b, that are not included in line items above.

Under the Board’s capital plan and stress test rules, a BHC’s or IHC’s or SLHC’s calculations of pro forma regulatory capital ratios over the planning horizon shall not include estimates using the advanced approaches (See 12 CFR 225.8(b)(3)(i), 12 CFR part 238, 12 CFR 252.43(d)(1), and 12 CFR 252.53(d)(1)). Accordingly, for this line item, an advanced approaches BHC that has exited parallel run should not include expected credit losses that exceed the eligible credit reserves. Firms must reflect the impact of the global market shock on items subject to adjustment or deduction in capital. If a firm adjusts its projection of an item to reflect the impact of the global market shock, it must also

DRAFT

report an adjusted starting value that reflects the global market shock.

Line item 35 Non-significant investments in the capital of unconsolidated financial institutions in the form of common stock that exceed the 10 percent threshold for non-significant investments

This line item should be reported reflective of any applicable transition provisions, and should correspond to the definition in FR Y-9C, Schedule HC-R, part I, line item 11. Firms must reflect the impact of the global market shock on items subject to adjustment or deduction in capital. If a firm adjusts its projection of an item to reflect the impact of the global market shock, it must also report an adjusted starting value that reflects the global market shock.

Line item 36 Subtotal (item 23 minus items 24 through 35)

This item is a shaded cell and is derived from line item 23 minus line items 24 through 35. This should correspond to the definition in FR Y-9C, Schedule HC-R, part I, line item 12.

Line item 37 Significant investments in the capital of unconsolidated financial institutions in the form of common stock, net of associated DTLs, that exceed 10 percent common equity tier 1 capital deduction threshold

This line item should be derived from line item 71, reflective of any applicable transition provisions, and should correspond to the definition in FR Y-9C, Schedule HC-R, part I, line item 13. Firms must reflect the impact of the global market shock on items subject to adjustment or deduction in capital. If a firm adjusts its projection of an item to reflect the impact of the global market shock, it must also report an adjusted starting value that reflects the global market shock.

Line item 38 MSAs, net of associated DTLs, that exceed the 10 percent common equity tier 1 capital deduction threshold

This line item should be derived from line item 76, reflective of any applicable transition provisions, and should correspond to the definition in FR Y-9C, Schedule HC-R, part I, line item 14.

Line item 39 DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs, that exceed the 10 percent common equity tier 1 capital deduction threshold

This line item should be derived from line item 79, reflective of any applicable transition provisions, and should correspond to the definition in FR Y-9C, Schedule HC-R, part I, line item 15.

Institutions that have adopted ASU 2016-13 and have elected to apply the CECL transition provision should include the applicable portion of the CECL transitional amount in this item.

Line item 40 Amount of significant investments in the capital of unconsolidated financial institutions in the form of common stock; MSAs, net of associated DTLs; and DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs; that exceeds the 15 percent common equity tier 1 capital deduction threshold

This line item should be derived from line item 84, reflective of any applicable transition provisions, and should correspond to the definition in FR Y-9C, Schedule HC-R, part I, line item 16.

Line item 41 Deductions applied to common equity tier 1 capital due to insufficient amount of additional tier 1 capital and tier 2 capital to cover deductions

DRAFT

Report the total amount of deductions as defined in FR Y-9C, Schedule HC-R, part I, line item 17, if the holding company does not have a sufficient amount of additional tier 1 capital and tier 2 capital to cover these corresponding additional tier 1 and tier 2 deductions in line items 47 and 57.

Line item 42 Total adjustments and deductions for common equity tier 1 capital

This line item is a shaded cell that is derived from the sum of line items 37 through 41. This item should correspond to the definition in FR Y-9C, Schedule HC-R, part I, line item 18.

Line item 43 Common equity tier 1 capital

This line item is a shaded cell that is derived from line item 36 minus line item 42. This line item is the numerator of the holding company's common equity tier 1 risk-based capital ratio, which should align with the definition in FR Y-9C, Schedule HC-R, part I, line item 19.

Additional tier 1 capital

Line item 44 Additional tier 1 capital instruments plus related surplus

Report this line item as defined in FR Y-9C, Schedule HC-R, part I, line item 20.

Line item 45 Non-qualifying capital instruments subject to phase out from additional tier 1 capital

Report this line item as defined in FR Y-9C, Schedule HC-R, part I, line item 21, subject to the applicable phase-out schedule as described within the Y-9C.

Line item 46 Tier 1 minority interest not included in common equity tier 1 capital

Report this line item as defined in FR Y-9C, Schedule HC-R, part I, line item 22.

Line item 47 Additional tier 1 capital before deductions

This is a shaded cell that is derived as the total of line items 44 through 46. This item should align with the definition in FR Y-9C, Schedule HC-R, part I, line item 23.

Line item 48 Additional tier 1 capital deductions

Report this line item as consistent with FR Y-9C, Schedule HC-R, part I, line item 24, including all applicable transition provisions.

Line item 49 Additional tier 1 capital

Report this line item as defined in FR Y-9C, Schedule HC-R, Part I, line item 25.

Tier 1 capital

Line item 50 Tier 1 capital (sum of items 43 and 49)

This line item is a shaded cell and is derived from the sum of line items 43 and 49. This line item is the numerator of the holding company's tier 1 risk-based capital ratio and tier 1 leverage ratio and should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 26.

Tier 2 capital

Line item 51 Tier 2 capital instruments plus related surplus

Report the amount as defined in FR Y-9C, Schedule HC-R, part I, line item 27.

DRAFT

Line item 52 Non-qualifying capital instruments subject to phase out from tier 2 capital

Report the total amount of non-qualifying capital instruments that were included in tier 2 capital as defined in FR Y-9C, Schedule HC-R, part I, line item 28.

Line item 53 Total Capital minority interest that is not included in tier 1 capital

Report the amount of total capital minority interest as defined in FR Y-9C, Schedule HC-R, part I, line item 29.

Line item 54 Allowance for loan and lease losses includable in tier 2 capital

Report the portion of the holding company's allowance for loan and lease losses that are includable in tier 2 capital, as defined in FR Y-9C, Schedule HC-R, part I, line item 30a.

Institutions that have adopted ASU 2016-13 should report the adjusted allowances for credit losses on loans and leases that are includable in tier 2 capital, as defined in the regulatory capital rule.

Institutions that have adopted ASU 2016-13 and have elected to apply the transition provision should subtract the applicable portion of the adjusted allowances for credit losses transitional amount from this item.

Line item 55 (Advanced approaches holding companies that exit parallel run only): eligible credit reserves includable in tier 2 capital

BHCs and IHCs do not have to report this line item.

Line item 56 Unrealized gains on available-for-sale preferred stock classified as an equity security under GAAP and available-for-sale equity exposures includable in tier 2 capital

BHCs, SLHCs and IHCs should report this line item consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 31.

Line item 57 Tier 2 capital before deductions

This line item is a shaded cell that is derived from the sum of line items 51, 52, 53, 54, and 56. This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 32.a.

Line item 58 (Advanced approaches holding companies that exit parallel run only): Tier 2 capital before deductions, reflective of transition procedures

BHCs, SLHCs and IHCs do not have to report this line item.

Line item 59 Tier 2 capital deductions

Report total tier 2 capital deductions as defined in the FR Y-9C, Schedule HC-R, part I, line item 33.

Line item 60 Tier 2 capital

This line item is a shaded cell that is derived from line item 57 minus line item 59. This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 34.a.

Line item 61 (Advanced approaches holding companies that exit parallel run): Tier 2 capital, reflective of transition provisions

BHCs and IHCs are not required to complete this line item.

DRAFT

Total Capital

Line item 62 Total capital

This line item is a shaded cell that is derived from the sum of line items 50 and 60. This line item is the numerator of the holding company's total risk-based capital ratio and should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 35.a.

Line item 63 (Advanced approaches holding companies that exit parallel run only): Total capital, reflective of transition provisions (sum of items 50 and 61)

BHCs and IHCs are not required to complete this line item.

Threshold Deductions Calculations

Non-significant investments in the capital of unconsolidated financial institutions in the form of common stock, net of associated DTLs

Line item 64 Aggregate non-significant investments in the capital of unconsolidated financial institutions, including in the form of common stock, additional tier 1, and tier 2 capital

Aggregate holdings of capital instruments relevant to non-significant investments in the capital of unconsolidated financial entities. This should correspond to the definition of non-significant investments in FR Y-9C, Schedule HC-R, part I, line item 11. Firms must reflect the impact of the global market shock on items subject to adjustment or deduction in capital. If a firm adjusts its projection of an item to reflect the impact of the global market shock, it must also report an adjusted starting value that reflects the global market shock.

Line item 65 10 percent common equity tier 1 deduction threshold for non-significant investments in the capital of unconsolidated financial institutions in the form of common stock

This line item is a shaded cell and is derived as ten percent of (line item 23 less line items 24 through 34).

Line item 66 Amount of non-significant investments that exceed the 10 percent deduction threshold for non-significant investments

This line item is a shaded cell and is derived as line item 64 less line item 65. If line item 65 is greater than line item 64 this is set to zero. This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 11.

Significant investments in the capital of unconsolidated financial institutions in the form of common stock, net of associated DTLs

Line item 67 Gross significant investments in the capital of unconsolidated financial institutions in the form of common stock

Aggregate holdings of capital instruments relevant to significant investments in the capital of unconsolidated financial entities, including direct, indirect and synthetic holdings in both the banking book and trading book. Firms must reflect the impact of the global market shock on items subject to adjustment or deduction in capital. If a firm adjusts its projection of an item to reflect the impact of the global market shock, it must also report an adjusted starting value that reflects the global market shock.

DRAFT

Line item 68 Permitted offsetting short positions in relation to the specific gross holdings included above

Offsetting positions in the same underlying exposure where the maturity of the short position either matches the maturity of the long position or has a residual maturity of at least one year.

Line item 69 Significant investments in the capital of unconsolidated financial institutions in the form of common stock net of short positions

This line item is a shaded cell and is the greater of line item 67 minus line item 68 or zero. This line item should correspond to the definition of significant investments in FR Y-9C, Schedule HC-R, part I, line item 13.

Line item 70 10 percent common equity tier 1 deduction threshold

This line item is a shaded cell and is derived from 10 percent of line item 36.

Line item 71 Amount to be deducted from common equity tier 1 due to 10 percent deduction threshold

This line item is a shaded cell and is the greater of line item 69 minus line item 70. If line item 70 is greater than line item 69 this is set to zero. This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 13.

MSAs, net of associated DTLs

Line item 72 Total mortgage servicing assets classified as intangible

Report the amount of MSAs included in Schedule HC-M, line item 12(a), prior to any netting of associated DTLs.

Line item 73 Associated deferred tax liabilities which would be extinguished if the intangible becomes impaired or derecognized under the relevant accounting standards

The amount of mortgage servicing assets to be deducted from common equity tier 1 is to be offset by any associated deferred tax liabilities. If the bank chooses to net its deferred tax liabilities associated with mortgage servicing assets against deferred tax assets, those deferred tax liabilities should not be deducted again here.

Line item 74 Mortgage servicing assets net of related deferred tax liabilities

This line item is a shaded cell and is derived as line item 72 minus line item 73. This line item should correspond to the definition of MSAs in FR Y-9C, Schedule HC-R, part I, line item 14.

Line item 75 10 percent common equity tier 1 deduction threshold

This line item is a shaded cell and is derived as 10 percent of line item 36.

Line item 76 Amount to be deducted from common equity tier 1 due to 10 percent deduction threshold

This line item is a shaded cell and is derived from line item 74 minus line item 75. If line item 75 is greater than line item 74 this is set to zero. This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 14.

DRAFT

DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs

Line item 77 DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs

Report this line item consistent with the definition of DTAs in FR Y-9C, Schedule HC-R, part I, line item 15.

Institutions that have adopted ASU 2016-13 and have elected to apply the CECL transition provision should include the applicable portion of the CECL transitional amount in this item.

Line item 78 10 percent common equity tier 1 deduction threshold

This line item is a shaded cell and is derived as 10 percent of line item 36.

Line item 79 Amount to be deducted from common equity tier 1 due to 10 percent deduction threshold

This line item is a shaded cell and is derived from line items 77 minus 78. If line item 78 is greater than line item 77 this is set to zero. This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 15.

Aggregate of items subject to the 15% limit (significant investments, mortgage servicing assets and deferred tax assets arising from temporary differences)

Line item 80 Sum of items 69, 74, and 77

This line item is a shaded cell and is derived as the sum of line items 69, 74, and 77.

Line item 81 15 percent common equity tier 1 deduction threshold

This line item is a shaded cell and is derived as 15 percent of line item 36. For advanced approaches firms, starting January 1, 2018, this line item is derived as 17.65 percent of (line item 36 minus line item 80).

Line item 82 Sum of items 71, 76, and 79

This line item is a shaded cell and is derived as the sum of line items 71, 76, and 79.

Line item 83 Item 80 minus item 82

This line item is a shaded cell and is derived from line items 80 minus line item 82.

Line item 84 Amount to be deducted from common equity tier 1 due to 15 percent deduction threshold, prior to transition provision (greater of item 83 minus item 81 or zero)

This line item is a shaded cell and is derived as line items 81 minus line item 83. If line item 83 is greater than line item 81 this is set to zero. This should correspond to the definition in FR Y-9C, Schedule HC-R, part I, line item 16.

Total Assets for the Leverage Ratio (12 CFR 217)

Line item 85 Average total consolidated assets²³

²³ Institutions that have adopted ASU 2016-13 and have elected to apply the transition provision should include the applicable portion of the CECL transitional amount in item 36.

DRAFT

Report the amount of average total consolidated assets as defined in FR Y-9C, Schedule HC-R, part I line item 36.

Line item 86 Deductions from common equity tier 1 capital and additional tier 1 capital

Report the amount of deductions from common equity tier 1 capital and additional tier 1 capital as defined in the FR Y-9C, Schedule HC-R, part I line item 37.

Line item 87 Other deductions from (additions to) assets for leverage ratio purposes

Report the amount of other deductions from assets as defined in FR Y-9C, Schedule HC-R, part I line item 38. If the amount is a net deduction, report it as a positive value in this line item. If the amount is a net addition, report it as a negative value in this line item.

Line item 88 Total assets for the leverage ratio (line item 85 minus line items 86 and 87)

This line item is a shaded cell and is derived as line item 85 minus line items 86 and 87. This should correspond to the definition in FR Y-9C, Schedule HC-R, part I line item 39.

REGULATORY CAPITAL AND RATIOS

Line item 89 Common Equity Tier 1

This line item is a shaded cell and is derived from line item 43.

Line item 90 Tier 1 Capital

This line item is a shaded cell and is derived from line item 50.

Line item 91 Total Capital

This line item is a shaded cell and is derived from line item 62.

Line item 92 Total Capital (advanced approaches institutions that exit parallel run only)

Respondents are not required to complete this line item.

Line item 93 Total risk-weighted assets using standardized approach

This should correspond to the definition of total risk-weighted assets in FR Y-9C, Schedule HC-R, part I, line item 40.a. For Capital – CCAR, please report the total amount of Standardized RWA, as reported on line item 44 of FR Y-14 A.1.c.2, Schedule A – Summary Standardized RWA sub-schedule. For Capital – DFAST, report total risk-weighted assets as calculated consistent with the DFAST capital action assumptions.

Line item 94 (Advanced approaches holding companies that exit parallel run only): total risk-weighted assets using advanced approaches rules

BHCs, IHCs and SLHCs are not required to fill out this line item.

Line item 95 Total Assets for the Leverage Ratio per the regulatory capital rule

This is derived from line item 88 and should correspond to definition in FR Y-9C, Schedule HC-R, part I, line item 39.

Line item 96 Supplementary Leverage Ratio Exposure

Starting January 1, 2018, BHCs and SLHCs subject to the supplementary leverage ratio should report their total supplementary leverage ratio exposure consistent with the definition in 12 CFR 217.

DRAFT

Line item 97 Common Equity Tier 1 Ratio (%)

This line item is derived from line item 89 divided by line item 93. This line item should correspond to definition in FR Y-9C, Schedule HC-R, part I, line item 41.A.

Line item 98 Common Equity Tier 1 Ratio (%) (advanced approaches institutions that exit parallel run only)

BHCs, SLHCs and IHCs are not required to fill out this line item.

Line item 99 Tier 1 Capital Ratio (%)

This line item is derived from line item 90 divided by line item 93. This line item should correspond to definition in FR Y-9C, Schedule HC-R, part I, line item 42.A.

Line item 100 Tier 1 Capital Ratio (%) (advanced approaches institutions that exit parallel run only)

BHCs, SLHCs and IHCs are not required to fill out this line item.

Line item 101 Total risk-based capital ratio (%)

This line item is derived from line item 91 divided by line item 93. This line item should correspond to definition in FR Y-9C, Schedule HC-R, part I, line item 43.A.

Line item 102 Total risk-based capital ratio (%) (advanced approaches institutions that exit parallel run only)

BHCs, SLHCs and IHCs are not required to fill out this line item.

Line item 103 Tier 1 Leverage Ratio (%)

This line item is derived from line item 90 divided by line item 95. This line item should correspond to definition in FR Y-9C, Schedule HC-R, part I, line item 44.

Line item 104 Supplementary Leverage Ratio (%)

This line item is derived from line item 90 divided by line item 96. This item is reported starting January 1, 2018.

Capital Buffers and Ratios**Line item 105 Capital conservation buffer requirement (sum of items a through c).****Line item 105(a) of which: Stress capital buffer requirement.**

This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 49(a), column A.

Line item 105(b) of which: GSIB surcharge (if applicable).

This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 49(b), column A. This should be equal to the GSIB surcharge that is currently calculated for the firm in each projection quarter.

DRAFT

Line item 105(c) of which: Countercyclical capital buffer amount (if applicable).

This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 49(c), column A. This should equal the amount of the capital conservation buffer in the as-of date quarter and should reflect any known upcoming changes.

Line item 106 Capital conservation buffer.

This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 50, column A.

Leverage Buffer and Requirements

Line item 107 Total leverage exposure for the supplementary leverage ratio (SLR) (if applicable).

This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 51.

Line item 108 Leverage buffer requirement (if applicable).

This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 52.

Line item 109 Leverage buffer (if applicable).

This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 53.

Maximum Payout Ratios and Amounts

Line item 110 Eligible retained income.

This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 54.

Line item 111 Maximum payout ratio.

This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 55.

Line item 112 Maximum payout amount.

This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 56.

Line item 113 Distributions and discretionary bonus payments during the quarter.

This line item should be consistent with the definition in FR Y-9C, Schedule HC-R, part I, line item 57.

Schedule HC-F—Other Assets

Line item 114 Net deferred tax assets

Report net deferred tax assets, as defined in FR Y-9C, Schedule HC-F, line item 2.

Schedule HC-G—Other Liabilities

Line item 115 Net deferred tax liabilities

DRAFT

Report net deferred tax liabilities, as defined in FR Y-9C, Schedule HC-G, line item 2.

Issuances associated with the U.S. Department of Treasury Capital Purchase Program

Line item 116 Senior perpetual preferred stock or similar items

Report issuances of senior perpetual preferred stock or similar items associated with the U.S. Department of Treasury capital purchase program, as defined in FR Y-9C, Schedule HC-M, line item 24.a.

Line item 117 Warrants to purchase common stock or similar items

Report issuances of warrants to purchase common stock or similar items associated with the U.S. Department of Treasury capital purchase program, as defined in FR Y-9C, Schedule HC-M, line item 24.b.

Deferred Tax Asset Information

Line item 118 Taxes previously paid that the bank holding company could recover through allowed carrybacks if the bank holding company's DTAs on net operating loss, tax credits and temporary differences (both deductible and taxable) fully reverse at the report date

Report the amount of taxes previously paid that the firm company could recover through loss carrybacks or carrybacks of projected negative income (i.e., net operating loss and credits) if the firm's DTAs on net operating loss, tax credits, and temporary differences (both deductible and taxable) fully reverse at report date. Report the full amount recoverable without consideration of the bank holding company's DTA/DTL position at the reporting date. For purposes of this line item, the firm should not include taxes paid in jurisdictions that do not allow a firm to recover taxes in prior fiscal years. Report disaggregated data for taxes paid in memorandum line items 125, 126, and 127. Report disaggregated data for taxes paid in memorandum line items 126, 127, and 128.

(a) U.S. Federal Government

Report line 118a as it relates solely to the U.S. Federal Government

(b) U.S. State Governments

Report line 118b as it related to all U.S. State governments.

(c) All non-U.S. tax jurisdictions

Report line 118c as it related to all non-U.S. tax jurisdictions.

Line item 119 Deferred tax assets that arise from net operating loss and tax credit carryforwards, net of DTLs, but gross of related valuation allowances

Report the aggregate amount of DTAs that arise from net operating loss and tax credit carryforwards, net of associated DTLs, but gross of associated valuation allowances. This line item should correspond to the definition of DTAs in FR Y-9C, Schedule HC-R, part I, line item 8, before the application of any transition provisions plus any related valuation allowances.

Line item 120 Valuation allowances related to deferred tax assets that arise from net operating loss and tax credit carryforwards

Report any valuation allowances related to DTAs that arise from net operating loss and tax credit

DRAFT

carryforwards, net of associated DTLs.

(a) U.S. Federal Government

Report line 120a as it relates solely to the U.S. Federal Government

(b) U.S. State Governments

Report line 120b as it related to all U.S. State governments.

(c) All non-U.S. tax jurisdictions

Report line 120c as it related to all non-U.S. tax jurisdictions.

Line item 121 Deferred tax assets arising from temporary differences, net of DTLs

Report the aggregate amount of DTAs arising from temporary differences net of DTLs. If DTLs exceed DTAs from temporary differences, this item should be reported as a negative number. This line item should correspond to the gross amount of DTAs arising from temporary differences, net of DTLs as defined in FR Y-9C, Schedule HC-R, part I, line item 15, before any netting associated with potential net operating loss carrybacks or related valuation allowances.

(a) U.S. Federal Government

Report line 121a as it relates solely to the U.S. Federal Government

(b) U.S. State Governments

Report line 121b as it related to all U.S. State governments.

(c) All non-U.S. tax jurisdictions

Report line 121c as it related to all non-U.S. tax jurisdictions.

Line item 122 Valuation allowances related to DTAs arising from temporary differences

Report any valuation allowances related to DTAs arising from temporary differences.

(a) U.S. Federal Government

Report line 122a as it relates solely to the U.S. Federal Government

(b) U.S. State Governments

Report line 122b as it related to all U.S. State governments.

(c) All non-U.S. tax jurisdictions

Report line 122c as it related to all non-U.S. tax jurisdictions.

Supplemental Capital Action Information

Line item 123 Cash dividends declared on common stock

Line item 124 Common shares outstanding (Millions)

Report the number (in millions) of common shares outstanding at the time dividends on common stock are declared such that line item 116 reflects the firm's intended quarterly distribution of common dividends per share.

Line item 125 Common dividends per share (\$)

DRAFT

Report the firm's intended quarterly distribution in common dividends per share.

Line item [126](#) Issuance of common stock for employee compensation

Report the amount (in \$millions) of the issuance of common stock for employee compensation. Include increases and decreases in additional paid in capital (APIC) attributable to the amortization of employee stock compensation and any changes in APIC, treasury or common stock as a result of the actual issuance of common stock for the employee stock compensation.

Line item [127](#) Other issuance of common stock

Report the amount (in \$millions) of other issuance of common stock (other than for employee compensation).

Line item [128](#) Total issuance of common stock

Line item [129](#) Share repurchases to offset issuance for employee compensation

Report the amount (in \$millions) of share repurchases to offset the issuance of stock for employee compensation.

Line item [130](#) Other share repurchases

Report the amount (in \$millions) of all other share repurchases.

Line item [131](#) Total share repurchases

Supplemental Information on Trust Preferred Securities Subject to Phase-Out from Tier 1 Capital

Line item [132](#) Outstanding trust preferred securities

Report the outstanding notional balance of trust preferred securities as defined in FR Y-9C, Schedule HC, line item 19b.

Line item [133](#) Trust preferred securities included in item 49

Report trust preferred securities qualifying for tier 1 capital and included in line item 49 above.

MEMORANDA:

Memoranda Line item [134](#) Itemized other adjustments to equity capital

Report amounts separately of other adjustments to equity capital included in line item 16, and provide a text explanation of each type of adjustment.

Itemized historical data related to taxes paid:

Memoranda Line item [135](#) Taxes paid during fiscal year ended two years ago

Report the amount of taxes paid during fiscal year ended two years ago that are included in line item 109, assuming that fiscal years align with calendar years.

Memoranda Line item [136](#) Taxes paid during fiscal year ended one year ago

Report the amount of taxes paid during fiscal year ended one year ago that are included in line item 109, assuming that fiscal years align with calendar years.

Memoranda Line item [137](#) Taxes paid through the as-of date of the current fiscal year

DRAFT

Report the amount of taxes paid during the current fiscal year through the as-of date that are included in line item 109, assuming that fiscal years align with calendar years.

Memoranda Line item [138](#) Reconcile the Supplemental Capital Action and HI-A projections

In this line item, reconcile the supplemental capital actions reported with HI-A projections reported in line items 1 through 15; that is, allocate the capital actions among the HI-A buckets.

Supporting Documentation

Please refer to Appendix A: Supporting Documentation for guidance on providing supporting documentation.

A.2 Retail

Loans on the retail schedules should be reported based on the loan's classification on the FR Y-9C, Schedule HC-C (i.e. based on the loans collateral, counterparty, or purpose). Refer to the FR Y-9C instructions for Schedule HC-C for guidance on loan classification. All loans should be reported net of charge-offs.

Throughout the retail-related sub-schedules, Domestic refers to portfolios held in domestic US offices (as defined in the FR Y-9C glossary), and International refers to portfolios outside of the domestic US offices.

A.2.a—Retail Balance and Loss Projections

The Retail Balance and Loss Projections sub-schedule collects projections of business-line level balances and losses on BHCs', IHCs' and SLHCs' held for investment loans accounted for at amortized cost (accrual loans). Loans held for sale and loans held for investment under the fair value option should not be included.

Retail Loan Categories

A. First Lien Mortgages (in Domestic Offices)

The loan population includes all domestic first lien mortgage loans directly held on the BHC's, IHC's or SLHC's portfolio. Portfolio loans are all loans as defined in the FR Y-9C, Schedule HC-C, item 1.c.2.(a).

B. First Lien HELOANs (in Domestic Offices)

The Loan population includes all domestic first lien home equity loans directly held on the BHC's, IHC's or SLHC's portfolio. Portfolio loans are all loans as defined in the FR Y-9C, Schedule HC-C, item 1.c.(2)(a).

C. Closed-End Junior Liens (in Domestic Offices)

The loan population includes all domestic loans directly held on the BHC's, IHC's, or SLHC's portfolio. Portfolio loans are all loans as defined in the FR Y-9C, Schedule HC- C, item 1.c.(2)(b).

D. HELOCs (in Domestic Offices)

The loan population includes all first and junior lien domestic lines directly held on the BHC's, IHC's, or SLHC's portfolio. Portfolio lines are all loans as defined in the FR Y-9C, Schedule HC-C, item 1.c.(1).

E. First Lien Mortgages and HELOANs (International)

DRAFT

The loan population includes all non-domestic loans directly held on the BHC's, IHC's or SLHC's portfolio. Portfolio loans are all loans as defined in the FR Y-9C, Schedule HC-C, item 1.c.(2)(a).

F. Closed-End Junior Liens and Home Equity Lines Of Credit (International)

The loan population includes all non-domestic loans/lines directly held on the BHC's, IHC's or SLHC's portfolio. Portfolio loans are all loans/lines as defined in the FR Y-9C, Schedule HC -C, item 1.c.(2)(b), and item 1.c.(1).

G. Corporate Card (Domestic)

Employer-sponsored domestic credit cards for use by a company's employees. This includes US corporate credit card loans as defined in the FR Y-9C, Schedule HC-C, item 4.a, and US corporate card loans reported in other FR Y-9C lines.

Only include cards where there is any individual liability associated with the sub-lines such that individual borrower characteristics are taken into account during the underwriting decision, and/or performance on the credit is reported to the credit bureaus.

Loans for which a commercially-graded corporation is ultimately responsible for repayment of credit losses incurred should not be reported in this Sub-schedule.

H. Business Card (Domestic)

Small business domestic credit card accounts where the loan is underwritten with the sole proprietor or primary business owner as an applicant. Report at the control account level or the individual pay level (not at the sub-account level). This includes SME credit card loans as defined in the FR Y-9C, Schedule HC-C, item 4.a, and US corporate card loans reported in other FR Y-9C lines.

Only include cards where there is any individual liability associated with the sub-lines such that individual borrower characteristics are taken into account during the underwriting decision, and/or performance on the credit is reported to the credit bureaus.

Loans for which a commercially-graded corporation is ultimately responsible for repayment of credit losses incurred should not be reported in this Sub-schedule.

I. Charge Card (Domestic)

Domestic credit cards for which the balance is repaid in full each billing cycle as defined in the FR Y-9C, Schedule HC-C item 6.a or 9.b.

Exclude charge cards to corporations and small businesses (report in Corporate Card or Business Card, as appropriate).

J. Bank Card (Domestic)

Regular general purpose domestic credit cards as defined in the FR Y-9C, Schedule HC-C, item 6.a or 9.b.

DRAFT

Bank cards include products that can be used at a wide variety of merchants, including any who accept MasterCard, Visa, American Express or Discover credit cards. Include affinity and co-brand cards in this category, and student cards, if applicable. This product type also includes private label or proprietary credit cards, which are tied to the retailer issuing the card and can only be used in that retailer's stores. Include oil and gas cards in this loan type.

Exclude bank cards to corporations and small businesses (report in Corporate Card or Business Card, as appropriate).

K. Business and Corporate Card (International)

Report employer-sponsored non-domestic credit cards for use by a company's employees and small business non-domestic credit card accounts where the loan is underwritten with the sole proprietor or primary business owner as an applicant. Such loans as defined in the FR Y-9C, Schedule HC-C, item 4.b, and International corporate and business card loans reported in other FR Y-9C lines.

For corporate cards, only include cards where there is any individual liability associated with the sub-lines such that individual borrower characteristics are taken into account during the underwriting decision, and/or performance on the credit is reported to the credit bureaus.

For bank cards, only include cards where there is any individual liability associated with the sub-lines such that individual borrower characteristics are taken into account during the underwriting decision, and/or performance on the credit is reported to the credit bureaus.

Loans for which a commercially-graded corporation is ultimately responsible for repayment of credit losses incurred should not be reported in this Sub-schedule.

L. Bank and Charge Card (International)

Include both non-domestic credit cards for which the balance is repaid in full each billing cycle and regular general purpose non-domestic credit cards as defined in the in FR Y-9C, Schedule HC-C item 6.a or 9.b.

Bank cards include products that can be used at a wide variety of merchants, including any who accept MasterCard, Visa, American Express or Discover credit cards. Include affinity and co-brand cards in this category, and student cards, if applicable. This product type also includes private label or proprietary credit cards, which are tied to the retailer issuing the card and can only be used in that retailer's stores. Include oil and gas cards in this loan type.

Exclude bank cards to corporations and small businesses (report in Corporate Card or Business Card, as appropriate).

M. Auto Loans (Domestic)

Include all domestic as defined in the FR Y-9C, Schedule HC-C, item 6.c and repossessed automobiles as defined in the FR Y-9C, Schedule HC-F, item 6.

N. Auto Loans (International)

DRAFT

Include all non-domestic as defined in the FR Y-9C, Schedule HC-C, item 6.c and repossessed automobiles as defined in the FR Y-9C, Schedule HC-F, item 6.

O. Auto Leases (Domestic)

Include domestic auto leases as defined in the FR Y-9C, Schedule HC-C, item 10.a and repossessed automobiles as defined in the FR Y-9C, Schedule HC-F, item 6.

P. Auto Leases (International)

Include non-domestic auto leases as defined in the FR Y-9C, Schedule HC-C, item 10.a and repossessed automobiles as defined in the FR Y-9C, Schedule HC-F, item 6.

Q. Student Loan

Include student loans as defined in the FR Y-9C, Schedule HC-C, items 6.b and 6.d.

R. Small Business Loan - Scored (Domestic)

The loan population of domestic small business loans is dependent on two factors: 1) the classification of the loan as defined in the FR Y-9C, Schedule HC-C (i.e. based on the collateral, counterparty, or purpose of the loan); and(2) whether the method to measure credit risk for the loan is different than that used for ordinary corporate loans.

- a. Reportable loans may include those small business loans that are included in the FR Y-9C, Schedule HC-C, items 2.a, 2.b, 3, 4.a and 4.b (excluding SME credit card loans included on Item 4.a) 7, 9.b.(1), 9.b.(2) and 10.b.
- b. To be classified as a small business loan, the method to measure credit risk must be different than the method used for other corporate loans. Commercial internal risk ratings or grades tend to not be used to assess credit risk for ordinary corporate loans. Meanwhile, small business loans tend to be scored or delinquency managed. Additionally, loans that are nevertheless internally risk weighted but that use a scale different from that used for ordinary corporate loans may also be considered small business loans.

S. Small Business Loan - Scored (International)

The population of international small business loans includes all non-domestic loans that fit the definition of small business loans (see above).

T. Other Consumer Loans and Leases (Domestic)

- a. Include all domestic loans as defined in the FR Y-9C, Schedule HC-C, items 6.b and 6.d excluding student loans and non-purpose based securities loans. Non-purpose based securities loans are loans secured by a portfolio of securities that are used for the purpose of something other than purchasing securities.
- b. Include domestic non-auto leases as defined in the FR Y-9C, Schedule HC-C, item 10.a.

U. Other Consumer Loans and Leases (International)

- a. Include all non-domestic loans as defined in the FR Y-9C, Schedule HC-C, items 6.b and 6.d excluding student loans and non-purpose securities based loans. Non-purpose securities based loans are loans secured by a portfolio of securities that are used for the purpose of something other than purchasing securities.
- b. Include non-domestic non-auto leases as defined in the FR Y-9C, Schedule HC-C, item 10.a.

DRAFT

For Sections A through U: Report line items 1 through 8 for the current quarter and nine subsequent projected quarters (PQ1 through PQ9). Reporting of projections for credit cards should be based on all open accounts (active and inactive), but not charged-off accounts

Line item 1 Balances

Report according to FR Y-9C definitions (end of quarter levels). Report end of quarter levels for each Section. Where requested, please segment the total balances reported by age. For those lines, balances should be classified according to the origination date of the account with which the balance is associated. The PCD breakout is only applicable to mortgage line items.

Line item 1a Balances - PCD²⁴

Report according to FR Y-9C definitions (end of quarter levels). Report end of quarter balances levels that are classified as PCD on the origination date of the account with which the balance is associated.

Line item 2 New Originations

Report the total dollar amount of new originations net of sales to Agencies. Report only originations for those loans and leases that the bank or intermediate holding company has the intent and ability to hold for the foreseeable future or until maturity or payoff.

Line item 3 Paydowns

Report the total dollar of repayments received in the given quarter.

Line item 4 Asset Purchases

Report the total dollar of assets purchased in the given quarter. Include mortgages repurchased from GNMA, GSEs, and private securitizations that are put back into the accrual book.

Line item 5 Asset Sales

Report the total dollar of assets sold in the given quarter, net of sales to Agencies.

Line item 6 Loan Losses

Report the total dollar of net charge-offs recognized in the given quarter. The PCD breakout is only applicable mortgage line items.

Line item 6a Loan Losses – PCD²⁵

Report the total dollar of net charge-offs to Non-accretable discount (NAD) and Allowance recognized in the given quarter for balances that are classified as PCD on the origination date of the account with which the balance is associated.

²⁴ Item 1a is only reported by institutions that have adopted ASU 2016-13.

²⁵ Item 6a is only reported by institutions that have adopted ASU 2016-13.

DRAFT

A.3 AFS/HTM Securities

General Instructions

High-Level OTTI Methodology and Assumptions for AFS and HTM Securities by Portfolio, Projected OTTI for AFS and HTM Securities by Portfolio, Projected OCI and Fair Value for AFS and Impaired HTM Securities, and Actual AFS and HTM Fair Market Value Sources by Portfolio collect data on the following types of securities:

- 1) *government agency mortgage-backed securities (MBS)*: MBS issued or guaranteed by U.S. Government agencies;
- 2) *auction rate securities*: auction-rate securities are variable rate securities with long-term maturities whose interest rates are periodically reset through auctions occurring at predetermined short-term intervals (generally 7, 14, 28, or 35 days);
- 3) *collateralized debt obligations (CDOs)*: CDOs are asset-backed securities collateralized by a discrete portfolio of fixed income assets and that make payments based on the performance of those assets;
- 4) *collateralized loan obligations (CLOs)*: CLOs are securitizations of portfolios of loans through a bankruptcy-remote special-purpose vehicle (SPV) that issues asset-backed securities in one or more classes (or tranches). In general, CLOs are backed by a variety of assets, including whole commercial loans, revolving credit facilities, letters of credit, and bankers' acceptances;
- 5) *commercial mortgage-backed securities (CMBS)*: Exclude securities that have been issued or guaranteed by the Federal National Mortgage Association (FNMA) or the Federal Home Loan Mortgage Corporation (FHLMC) or guaranteed by the Government National Mortgage Association (GNMA). Report these securities as "Agency MBS" (above);
- 6) *common stock (equity)*;
- 7) *auto asset-backed securities (ABS)*: ABS collateralized by auto loans;
- 8) *credit card ABS*: ABS collateralized by credit card loans;
- 9) *student loan ABS*: ABS collateralized by student loans;
- 10) *other ABS (excluding home equity loan ABS)*: all other ABS that cannot properly be reported as auto ABS, credit card ABS, student loan ABS or home equity loan ABS;
- 11) *corporate bonds*: corporate bonds are debt obligations issued by corporations and may be secured or unsecured;
- 12) *covered bonds*: securities generally classified as "covered bonds" that feature recourse to cash flows of a pool of mortgages or public-sector loans on the balance sheet of an issuing financial institution;

DRAFT

- 13) *domestic non-government agency residential mortgage-backed securities (RMBS, includes home equity loan ABS)*: RMBS, including securities backed by home equity loans that are issued by domestic non-government agency entities. Such as Alt-A (option ARM), Alt-A FRM, Alt-A ARM, closed-end second, HELOC, Scratch & Dent, Subprime, Prime Fixed, and Prime ARM securities;
- 14) *foreign RMBS*: RMBS of foreign issuers;
- 15) *municipal bonds*: bonds issued by U.S. states, cities, counties, and other governmental entities at or below the state level. Include bonds issued by Canadian provinces or other local government entities and bonds issued by other non-US local government entities;
- 16) *mutual funds*: investments in mutual funds, including money market mutual funds and mutual funds that invest solely in U.S. government securities;
- 17) *preferred stock (equity)*: refer to the FR Y-9C Glossary entry for "Preferred Stock";
- 18) *sovereign bonds*: bonds issued by the central governments of foreign countries. Also, include in this category obligations of foreign country central banks, foreign central government units or agencies, fully government-guaranteed obligations of municipal or state-owned enterprises; and obligations of supranational organizations such as the International Bank for Reconstruction and Development (World Bank), Inter-American Development Bank, and Asian Development Bank;
- 19) *U.S. Treasuries & other government agency non-mortgage-backed securities*: U.S. government agency obligations issued by U.S. government agencies and U.S. government-sponsored agencies, including but not limited to, Small Business Administration "Guaranteed Loan Pool Certificates," U.S. Maritime Administration obligations, and Export-Import Bank participation certificates. Include obligations (other than mortgage-backed securities) issued by the Farm Credit System, the Federal Home Loan Bank System, the Federal Home Loan Mortgage Corporation, the Federal National Mortgage Association, the Financing Corporation, Resolution Funding Corporation, the Student Loan Marketing Association, and FDIC Structured Sale Guaranteed Notes and NCUA Guaranteed Notes; and
- 20) *other securities* (for "other" AFS and HTM securities, please provide the security type in row 22, currently labeled "Other", adding extra rows below as necessary): all securities that cannot properly be reported in the categories above.

In circumstances whereby the BHC, IHC or SLHC holds securities in both AFS and HTM categories within a given asset class, separate each security into separate rows. If using additional rows, BHCs, IHCs or SLHCs should ensure that the totals sum appropriately) as defined in the FR Y-14Q, Schedule B, Securities. All BHCs, IHCs or SLHCs should estimate results using the conditions specified in the macroeconomic scenario. Securities should correspond with where the reporter has classified the asset on the balance sheet of the FR Y-9C.

For the 2019 CCAR cycle (data as of December 31, 2018), institutions should continue to report sub-schedules A.3.b – A.3.e. Starting from 2020 CCAR cycle (data as of December 31, 2019), institutions that have not adopted ASU 2016-13 should continue to report sub-schedules A.3.b – A.3.e; whereas institutions that have adopted ASU 2016-13 should report sub-schedules A.3.d - A.3.g, and sub-

DRAFT

schedules A.3.d and A.3.e should only be filled out for AFS and Equity securities.²⁶

A.3.b—High-Level OTTI Methodology and Assumptions for AFS and HTM Securities by Portfolio

Large and noncomplex firms are not required to complete this subschedule.

Complete the unshaded cells in the table provided. In the “Threshold for Determining OTTI” column, report either the price-based threshold, the ratings-based threshold, the cash flow model-based threshold, or other threshold. Report the aggregate cumulative lifetime loss on underlying collateral (% original balance) as the total undiscounted loss amount (including both historical and projected losses) for the underlying collateral as a percentage of original principal balance of the securities aggregated by portfolio. In the “discount rate methodology” column, state whether a market-based or accounting-based (e.g., book /purchase price) discount is used. In the final three columns: provide the name(s) of any vendor(s) and any vendor models that are used, indicate whether all securities were reviewed for potential OTTI for stress testing and provide the macro-economic and financial variables used in loss estimation.

A.3.c—Projected OTTI for AFS and HTM Securities by Portfolio

Provide the credit loss portion and non-credit loss portion of projected OTTI (for relevant portfolios) for the quarters detailed in the tables provided. Values should be quarterly, not cumulative. Institutions that have adopted ASU 2016-01, which includes provisions governing the accounting for investments in equity securities, should continue to report the “Actual Amortized Cost” field for equity securities in this schedule. However, all other fields in this schedule for equity securities should be left blank.

OTTI related to the security’s credit loss is recognized in earnings, whereas the OTTI related to other factors (defined as the non-credit loss portion) is included as part of a separate component of other comprehensive income (OCI). For only those securities determined to be other-than-temporarily impaired, BHCs and IHCs should provide both projected losses that would be recognized in earnings and any projected losses that would be captured in OCI. Amortized Cost should represent all Securities held, regardless of if they are impaired or not. OTTI values should be stated as positive values.

A.3.d— Projected OCI and Fair Value for AFS and Impaired HTM

This Schedule must be completed for all BHCs, SLHCs and IHCs regardless of subjectivity to the advanced approaches rule. Institutions that have adopted ASU 2016-01 should continue to report the “Fair Market Value,” “Beginning Fair Market Value,” and “Fair Value Rate of Change” fields for equity securities in this schedule. However, all “Projected OCI” fields in this schedule for equity securities should be left blank.

The “Fair Market Value” column is the end-of-quarter fair value of the portfolio assets for the reporting quarter.

The “Beginning Fair Market Value” in each column for the projected quarters represents the beginning-of-quarter fair value of the AFS and impaired HTM portfolio assets evaluated during the projected quarter. For avoidance of doubt, Securities purchased in the middle of the quarter should be

²⁶ Upon full adoption of ASU 2016-13, FR Y-14A sub-schedules A.3.b and A.3.c will be eliminated, and sub-schedules A.3.d and A.3.e will be renamed and revised to exclude HTM securities.

DRAFT

accounted for in the Beginning Fair Market Value of the subsequent quarter.

The “Fair Value Rate of Change” is the weighted average percent change in fair value over the quarter for assets projected to be held at the beginning and end of the relevant quarter. (The “Fair Value Rate of Change” is **not** a ratio of projected OCI to Beginning Fair Market Value). The Fair Value Rate of Change should represent the change in price of the assets whereby the change in fair value does not include amortizations or paydowns. Reinvested assets should be included if the securities were held at the beginning and end of the relevant quarter.

The “Projected OCI” in each column represents the pre-tax incremental change in Accumulated Other Comprehensive Income during the period due to changes in the fair value of the securities in the portfolio and may also reflect changes in amortized cost, including changes due to amortization and accretion, or any other anticipated factors affecting the amortized cost amounts of AFS and impaired HTM holdings. Future OCI may include fair value gains and losses on new instruments if re-investments are anticipated. These columns, including the “Total Projected OCI in all Quarters”, may be affected by changes in a securities' amortized cost due to a projected experience of OTTI and estimate of OTTI write-down for a given quarter.

A.3.e—Actual AFS and HTM Fair Market Value Sources by Portfolio

Large and noncomplex firms are not required to complete this subschedule.

Provide information on the sources of actual fair market values as of the reporting date. In the “Principal Market Value Source” column, state whether a vendor or proprietary model is used. If using a third party vendor, provide the name of the vendor. BHCs, SLHCs and IHCs should also indicate how often securities are normally marked to market (e.g., daily, weekly, quarterly, etc.). Institutions that have adopted ASU 2016-01 should continue to report all columns for equity securities in this schedule.

A.3.f – Expected Credit Loss and Provision for Credit Loss - HTM securities

Institutions should provide the following information on HTM securities on this subschedule:

The “Total Allowance for Credit Loss” column is the total allowance for HTM securities as of the report date (i.e., PQ0).

The “Provision for Credit Loss” column is the provision for HTM securities during the quarter.

A.3.g – Expected Credit Loss and Provision for Credit Loss - AFS securities

Institutions should provide the following information on AFS securities on this subschedule:

The “Total Allowance for Credit Loss” column is the total allowance for AFS securities as of the report date (i.e., PQ0).

The “Expected credit loss before applying the fair value floor” column is expected credit losses as defined by ASU 2016-13 and before applying the fair value floor that limits the allowance for credit losses to the amount by which fair value is below amortized cost.

The “Provision for Credit Loss” column is the provision for AFS securities during the quarter.

DRAFT

Supporting documentation:

Please refer to Appendix A: Supporting Documentation for guidance on providing supporting documentation.

DRAFT

A.4 Trading

Only the BHCs, IHCs and SLHCs subject to the market shock scenario are required to complete this sub-schedule.

Large and noncomplex firms are not required to complete this subschedule.

The Trading sub-schedule collects firm-wide trading profit and loss (P/L) results decomposed into the various categories listed (e.g., Equities, FX, Rates) as of a date specified by the Federal Reserve or another recent reporting date prior to the supplied as-of date as appropriate (see When to Report section of the General Instructions for additional detail). These categories are not meant to denote lines of business or desks, but rather firm-wide totals by risk. The decomposition of losses into risk areas should sum to equal the total trading mark-to-market (MTM) loss reported on the income statement. Report total P/L for the entire scenario horizon. When reporting P/L numbers, report profits as positive numbers and losses as negative numbers.

Column Instructions

Column A Firmwide Trading

Report firm-wide total trading profit and loss for the entire scenario horizon. Do not include P/L related to CVA hedges in this column.

Column B Firmwide CVA Hedges

Report firm-wide total P/L related to the Credit Value Adjustment (CVA) hedges.

Column C Firmwide Total

Contains the sum of the P/L related to the trading exposures and Credit Value Adjustment (CVA) hedges reported in columns (A) and (B).

Line item Instructions

The categories are not meant to denote lines of business or desks, but rather firmwide totals by risk. Categorization matches that on the FR Y-14Q. See FR Y-14Q Trading Schedule instructions for additional detail.

Line item 1 Equity

Contains the sum of the contributions to P/L from exposures associated with firmwide Equity risk reported in items 1A through 1I. No input required.

Line item 1A Equity: Delta/Gamma

Report the contribution to P/L from changes in Equity prices.

Line item 1B Equity: Vega

Report the first order contribution to P/L from changes in Equity volatility.

Line item 1C Equity: Dividends

Report the contribution to P/L from changes in dividend yields.

DRAFT

Line item 1D Equity: Correlation

Report the contribution to P/L from changes in Equity correlation.

Line item 1E Equity: Vanna (dVega/dSpot)

Report the contribution to P/L from Equity volatility given changes in Equity prices.

Line item 1F Equity: Volgamma (dVega/dVol)

Report the second order contribution to P/L from changes in Equity volatility.

Line item 1G Equity: Skew (moneyness)

Report the contribution to P/L from changes in Equity volatility skew.

Line item 1H Equity: Higher Order

Report other higher order contributions to P/L from changes in Equity related risks not included in items 1A through 1G.

Line item 1I Equity: Other

Report contributions to P/L from changes in other Equity related risks not included in items 1A through 1H. Please provide detailed description of Other P/L components in firm documentation.

Line item 2 FX

Contains the sum of contributions to P/L from exposures associated with firmwide FX risk reported in items 2A through 2D. No input required.

Line item 2A FX: Delta/Gamma

Report the total contribution to P/L from changes in FX rates.

Line item 2B FX: Vega

Report the total contribution to P/L from changes in FX volatility.

Line item 2C FX: Higher Order

Report other higher order contributions to P/L from changes in FX related risks not included in items 2A through 2B.

Line item 2D FX: Other

Report contributions to P/L from changes in other FX related risks not included in items 2A through 2C. Please provide detailed description of Other P/L components in firm documentation.

Line item 3 Rates

Contains the sum of the contributions to P/L from exposures associated with firmwide Rates risk reported in items 3A through 3H. No input required.

For Agency and Muni products, the P/L related to interest rates risk should be reported in this section.

Line item 3A Rates: Delta/Gamma

Report the total contribution to P/L from changes in interest rates.

Line item 3B Rates: Vega

DRAFT

Report the total contribution to P/L from changes in interest rate volatility.

Line item 3C Rates: Swap Spreads

Report the total contribution to P/L from changes in interest rate swap spreads.

Line item 3D Rates: Basis Spreads

Report the total contribution to P/L from changes in interest rate basis spreads.

Line item 3E Rates: Cross Currency Basis

Report the total contribution to P/L from changes in cross currency basis spreads

Line item 3F Rates: Inflation

Report the total contribution to P/L from changes in inflation rates.

Line item 3G Rates: Higher Order

Report higher order contributions to P/L from changes in interest rates related risks not included in items 3A through 3F.

Line item 3H Rates: Other

Report contributions to P/L from changes in other interest rate related risks not included in items 3A through 3G. Please provide detailed description of Other P/L components in firm documentation.

Line item 4 Commodities

Contains the sum of the contributions to P/L from exposures associated with firmwide Commodities risk reported in items 4A through 4M. No input required.

Line items 4A through 4K

Report the total contribution to P/L from changes in risks associated with each product category, e.g. report P/L related to changes in prices and volatility of Oil products under the Oil Products category.

Line item 4L Commodities: Higher Order

Report higher order contributions to P/L from changes in Commodities related risks not included in items 4A through 4K.

Line item 4M Commodities: Other

Report contributions to P/L from changes in other Commodities related risks not included in items 4A through 4L. Please provide detailed description of Other P/L components in firm documentation.

Line item 5 Securitized Products

Contains the sum of the contributions to P/L from exposures detailed on the Securitized Products and Agencies sub-schedules of the FR Y-14Q Trading Schedule reported in items 5A through 5J. No input required..

Line items 5A through 5G

Report the total contribution to P/L from changes in the values of each product category.

Line item 5H Securitized Products: Agencies

Report the total contribution to P/L from changes in Agency OAS/credit risks.

DRAFT

Line item 5I Securitized Products: Higher Order

Report higher order contributions to P/L from changes in Securitized Products related risks not included in items 5A through 5H.

Line item 5J Securitized Products: Other

Report contributions to P/L from changes in other Securitized Products related risks not included in items 5A through 5I. Please provide detailed description of Other P/L components in firm documentation.

Line item 6 Other Credit

Contains the sum of the contributions to P/L from all credit products in items 7, 8, 9, and 10 through 14. No input required.

Line item 7 Corporate Credit (Advanced)

Contains the sum of the contributions to P/L from corporate credit products in Advanced Economies, which are reported in items 7A through 7I. No input required. Reference the Regional Groupings section for the list of countries designated as Advanced Economies.

Line items 7A through 7H

Report the total contribution to P/L from changes in corporate credit risks associated with each product category.

Line item 7I Corporate Credit (Advanced): Other/Unspecified

Report contributions to P/L from changes in corporate credit risk to products not included in items 7A through 7H. Please provide detailed description of Other P/L components in firm documentation.

Line item 8 Corporate Credit (Emerging Markets)

Contains the sum of the contributions to P/L from corporate credit products in Emerging Markets, which are reported in items 8A through 8I. No input required. Emerging Markets encompass all countries not defined as Advanced Economies in the Regional Groupings section.

Line items 8A through 8H

Report the total contribution to P/L from changes in corporate credit risks associated with each product category.

Line item 8I Corporate Credit (Emerging Markets): Other/Unspecified

Report contributions to P/L from changes in corporate credit risk to products not included in items 8A through 8H. Please provide detailed description of Other P/L components in firm documentation.

Line item 9 Sovereign Credit

Contains the sum of the contributions to P/L from sovereign credit risks, which are included in items 9A through 9G. No input required.

Line items 9A through 9g

Report the total contribution to P/L from changes in sovereign credit risks associated with each regional category.

DRAFT

Line item 10 Munis

Report the total contribution to P/L from changes in municipal credit risks.

Line item 11 ARS

Report the total contribution to P/L from changes in ARS credit risks.

Line item 12 Base Correlation

Report the total contribution to P/L from changes in credit correlation.

Line item 13 Other Credit: Higher Order

Report higher order contributions to P/L from changes in traded credit related risks not included in items 6 through 10.

Line item 14 Other Credit: Other

Report contributions to P/L from changes in other traded credit related risks not included in items 6 through 13. Please provide detailed description of Other P/L components in firm documentation.

Line item 15 Private Equity

Contains the sum of the contributions to P/L from Private Equity exposures included in items 15A through 15C .

Line item 15A Private Equity: Funded

Report the contribution to P/L from funded exposures detailed on the Private Equity Sub-schedule of the FR Y-14Q Trading Schedule.

Line item 15B Private Equity: Unfunded

Report the contribution to P/L from unfunded commitments reported on the Private Equity Sub-schedule of the FR Y-14Q Trading Schedule.

Line item 15C Private Equity: Other

Report contributions to P/L from other private equity exposures not included in items 15A and 15B. Please provide detailed description of Other P/L components in firm documentation.

Line item 16 Other Fair Value Assets

Contains the sum of the contributions to P/L from other fair value exposures included in items 16A through 16C.

Line item 16A Other Fair Value Assets: Debt

Report the contribution to P/L from debt exposures detailed on the Other Fair Value Assets Sub-schedule of the FR Y-14Q Trading Schedule. Please provide detailed description of these exposures in firm documentation.

Line item 16B Other Fair Value Assets: Equity

Report the contribution to P/L from equity exposures detailed on the Other Fair Value Assets Sub-schedule of the FR Y-14Q Trading Schedule. Please provide detailed description of these exposures in firm documentation.

Line item 16C Other Fair Value: Other

DRAFT

Report contributions to P/L from other OFVA exposures not included in items 16A and 16B. Please provide detailed description of Other P/L components in firm documentation.

Line item 17 Cross-Asset Terms

Report the contribution to P/L from intra-asset risks attributable to the co-movement of multiple asset classes. For example, an equity option paying off in a foreign currency would have both Equity and FX risk. The P/L due to this co-dependence would be entered into item 17 and should not be divided among the individual categories listed in items 1 through 2D.

Line item 18 Total

Contains the sum of the subtotals in items 1 through 6 and 15 through 17. The sum of the totals in columns A and B must equal line 58, Trading mark-to-market (MTM) loss, reported on the Income Statement sub-schedule of this Schedule.

Supporting Documentation

Please refer to Appendix A: Supporting Documentation for guidance on providing supporting documentation.

Firms should also supply any additional information regarding the Trading P&L attribution submission in their supporting documentation, including a description of items included in the Other categories within each asset class.

A.5 Counterparty Credit Risk (CCR)

Large and noncomplex firms are not required to complete this subschedule.

The CCR sub-schedule collects projected counterparty credit losses as of a date specified by the Federal Reserve. Losses should be reported as positive values and gains should be reported as negative values..

Line item 1 Issuer Default Losses (Trading book)

Report losses arising from potential default of the issuers of securities held in the trading book.

Line item 1a Issuer Default losses from securitized products (Trading book)

Report losses arising from potential default of the issuers of securitized products, including RMBS, CMBS, and other securitized products as specified on the Securitized Products Sub-schedule of the FR Y-14Q Trading Schedule.

Line item 1b Issuer Default losses from other credit sensitive instruments (Trading book)

Report losses arising from potential default of the issuers of all other credit sensitive instruments (i.e., all products considered in Trading IDR losses other than securitized products), such as sovereigns, advanced economy corporate credits, and emerging market corporate credits.

Line item 2 Counterparty Credit MTM Losses (CVA Losses)

Report Counterparty Credit MTM Losses. Report total losses as equivalent to the BHC's or IHC's or SLHC's calculation of aggregate stressed CVA less unstressed CVA for each scenario. This figure, the sum of items 2a and 2b should correspond to the difference between aggregate stressed CVA and aggregate unstressed CVA, as reported in FR Y-14Q Schedule L – Counterparty, Sub-schedule 1.e, for all

DRAFT

scenarios.

Line item 2a Counterparty CVA losses

Report Counterparty CVA losses.

Line item 2b Offline Reserve CVA Losses

Report CVA losses that result from offline/additional CVA reserve.

Line item 3 Counterparty Default Losses

Report losses arising from potential default of one or more counterparties.

Line item 3a Impact of Counterparty Default Hedges

Report the reduction to Counterparty Default losses reported in item 3 due to the gains from single name CDS hedges (as defined in Schedule L of the FR Y-14Q) of defaulting counterparties.

Line item 4 Other Counterparty losses

Report other counterparty losses not reported in items 1, 2 or 3 above, as required by CCAR instructions.

Line Item 5 Funding Valuation Adjustment Losses

Report funding valuation adjustments losses.

Supporting Documentation

Please refer to Appendix A: Supporting Documentation.

A.6 BHC or IHC or SLHC Operational Risk Scenario Inputs and Projections

Operational risk losses are defined in the Revised Capital Framework as losses arising from inadequate or failed internal processes, people and systems, or from external events. Operational risk losses include legal losses but exclude boundary events. Boundary events are operational losses that could also be classified as credit event losses. An operational loss is defined as a financial loss (excluding insurance or tax effects) that results from an operational loss event and includes all expenses associated with an operational loss event except for opportunity costs, forgone revenue, and costs related to risk management and control enhancements implemented to prevent future operational losses. An operational loss event is defined as a financial loss that results from a risk exposure to the firm. Some examples of operational loss events that BHCs, SLHCs and IHCs may consider are losses related to improper business practices (including class action lawsuits), execution errors, cyber security breaches, natural disasters, and fraud. Operational risk loss projections should be included in the PPNR Projections sub-schedule in line 29, Operational Risk Expense.

See Schedule E – Operational Risk for additional operational risk reporting requirements.

Definitions

Refer to the following definitions when completing the five Operational Risk Scenario Inputs and Projections sub-schedule

- 1. Risk Segment:** The BHC's, SLHC's or IHC's internal classification of operational risk into granular risk categories used for risk management and operational risk loss projection purposes.

DRAFT

- 2. Loss Projection:** Loss estimates for each of the five Scenarios generated by different methodologies such as statistical models, scenario analysis, historical averages, etc.
- 3. Dollar Contribution to Operational Loss Projection (FR Y14 A Schedule 1.6):** For each risk segment, report the projected operational loss amount. The total of all risk segments for each CCAR Scenario should agree to the projected “Operational risk expense” amount included in Line 29 in the Scenario’s PPNR Projections sub-schedule.

Sub-schedule Instructions

The BHC, SLHC and IHC Operational Risk Scenario Inputs and Projections sub-schedule collects information about the composition of the operational risk loss projections. Each reporting institution should identify the operational risks to which it is exposed, develop and define the risk segments that represent the firm’s risks, and project operational losses using relevant data. Data can include external data, internal data, scenario analysis, risk assessment, etc. As appropriate, quantitative methodologies may be used to convert relevant data into loss projections. The overall Operational Risk loss projections should include input for each risk segment. Reporting institutions are expected to provide the type of data, a brief description of the loss event, how it was categorized (risk segment), and the total loss projection by risk segment.

Loss Projections based on Legal Reserves and Settlements

As part of the overall Operational Risk loss projections, BHCs, SLHCs and IHCs should report the potential impact of losses resulting from a firm’s actions to prevent or mitigate an operational loss settlement with clients, or to prevent future legal action. Each of the Operational Risk loss projections in each of the required CCAR Scenarios should include all projected settlements, make-whole payments, payouts that satisfy adverse legal rulings, and other legal losses if they are not covered on the PPNR Projections Sub-schedule under items 14N and 30 (Provisions to Repurchase Reserve / Liability for Residential Mortgage Representations and Warranties). If specifically linked to operational risk, BHCs and IHCs should include all legal consultation fees, retainer fees, and provisions to the legal reserve within the Operational Risk loss projections.

Unrelated Professional Services

The cost of outside consulting, routine “business as usual” legal expenses, external audit, and other professional services that are unrelated to operational risk should be included in item 31 (Professional and Outside Services Expenses) on the PPNR Projections Sub-schedule.

Supporting documentation:

Please refer to Appendix A: Supporting Documentation.

A.7 Pre-Provision Net Revenue (PPNR)

A. General Technical Details

This section provides general guidance and data definitions for the three PPNR sub-schedules included in the Summary Schedule: PPNR Projections sub-schedule, PPNR Net Interest Income (NII) sub-schedule, and PPNR Metrics sub-schedule. The three sub-schedules are described in detail below.

DRAFT

Certain commonly used terms and abbreviations, including PPNR, are defined at the end of this section. Other definitions are embedded in the Schedule. Undefined terms should be assumed to follow FR Y-9C definitions. In cases where FR Y-9C guidance is unavailable, BHCs, SLHCs and IHCs should use internal definitions and include information about the definitions used in the Supporting Documentation Instructions for FR Y-14A projections.

All line item definitions and identification numbers are consistent between the FR Y-14A and FR Y-14Q and data should be reported accordingly. Where specific FR Y-14 PPNR and/or FR Y-9C guidance exists for business line and/or other items, provide both historical and projections data consistently throughout time in accordance with the instructions. If a BHC, SLHC or IHC has not done so in prior filings, restate and resubmit. If a BHC, SLHC or IHC is unable to consistently adhere to definitions, it can request an exemption.

All quarterly figures should be reported on a quarterly basis (not on a year-to-date basis).

Provide data for all non-shaded cells, except where the data requested is optional. The BHC, SLHC or IHC is not required to populate cells shaded gray.

If there are no data for certain numerical fields, then populate the fields with a zero (0). If the fields are optional and a BHC, SLHC or IHC chooses not to report data, leave the fields blank. For numerical fields requesting information in percent (e.g. average rates earned), use standard format where .01 = 1%. Do not use non numerical characters in numerical fields.

If there is no information for certain descriptive fields, then populate the fields with "N/A." Do not leave descriptive fields blank.

The BHCs, SLHCs or IHCs need to ensure that (a) revenues and expenses reported always reconcile on a net basis to FR Y-9C, Schedule HI, item 3 plus item 5.m minus 7.e plus item 7.c(1) minus item 40 of PPNR Projections sub-schedule (note that this does not include losses resulting from the trading shock exercise), (b) Net Interest Income is equal between the PPNR Projections and PPNR Net Interest Income sub-schedules, and that (c) Average balances reported for the purposes of the PPNR Net Interest Income sub-schedule equal FR Y-9C, Schedule HC-K, item 5 for average assets and an average of FR Y-9C, Schedule HC, item 21 for average liabilities. BHCs, SLHCs and IHCs should follow the same guidance when restating data to correct any errors either internally identified or identified by the Federal Reserve.

Materiality Thresholds

All BHCs, SLHCs and IHCs should complete all three sub-schedules, including the Net Interest Income sub-schedule and the Net Interest Income sub-schedule section of the PPNR Metrics sub-schedule.

Report data for all quarters for a given business segment in the PPNR Projections and PPNR Metrics sub-schedules if the total revenue of that business segment (calculated as the sum of net interest income and noninterest income for that segment), relative to total revenue of the BHC, SLHC or IHC exceeded 5 percent in any of the most recent four actual quarters as provided by the BHC, SLHC or IHC in the FR Y-14Q.

If international revenue exceeded 5 percent of total revenue in any of the most recent four actual quarters as provided by the BHC or SLHC in the FR Y-14Q, provide regional breakouts (PPNR Metrics sub-schedule, items 42A-42 D) for all quarters in the PPNR Metrics sub-schedule.

DRAFT

If International Retail and Small Business revenues exceeded 5 percent of Total Retail and Small Business Segment revenue and Total Retail and Small Business Segment revenues were material based on an applicable 5 percent threshold in any of the most recent four actual quarters as provided by the BHC, SLHC or IHC in the FR Y-14Q, provide related metrics data for all quarters (PPNR Metrics sub-schedule, item 10).

Net Interest Income: Primary and Supplementary Designation

BHCs, SLHCs and IHCs are expected to report all line items for all sub-schedules subject to applicable thresholds as detailed in the instructions. In addition, for all BHCs, SLHCs and IHCs that are required to complete the *PPNR Net Interest Income* sub-schedule, the PPNR Net Interest Income sub-schedule should be designated as “Primary Net Interest Income.” The PPNR Projections Sub-schedule for such BHCs, SLHCs and IHCs will be “Supplementary Net Interest Income” by default. For BHCs, SLHCs and IHCs that are not required to complete the PPNR Net Interest Income sub-schedule the PPNR Projections Sub-schedule should be designated as “Primary Net Interest Income.” PPNR Net Interest Income Sub-schedule will be “Supplementary Net Interest Income” for such BHCs, SLHCs and IHCs by default, but is optional. Note that this designation would refer only to the net interest income portion of the sub-schedules.

B. Commonly Used Terms and Abbreviations

Credit cards: Unless specified otherwise, use the same definitions as provided in the FR Y-14M Credit Card schedule

Domestic and International Revenues: Report domestic and international revenues as reported on the FR Y-9C.

Pre-provision Net Revenue (PPNR): Sum of net interest income and noninterest income net of noninterest expense, with components expected to reconcile with those reported in the FR Y-9C when adjusted for certain items. As presented on the PPNR schedules, the adjustments include exclusions of Valuation Adjustment for BHC’s and IHC’s debt under fair value option (FVO), goodwill impairment, loss resulting from trading shock exercise (if applicable), as well as adjustments related to operational risk expense required for PPNR purposes. For the related items, reference the PPNR Projections sub-schedule and related instructions for the items 29, 40-42. Gains and losses on AFS and HTM securities, including other than temporary impairments (OTTI) estimates, are not a component of PPNR.²⁷ All revenue and expenses related to mortgage servicing rights (MSRs) are components of PPNR to be reported in the associated noninterest income and noninterest expense line items on the PPNR schedules. Total Loans Held for Sale and Loans Accounted for under the Fair Value Option (item 57 of the Income Statement sub-schedule) are excluded only if they are a result of a market shock exercise. Other Losses (item 66) are excluded as applicable and are expected to be infrequent.

Revenues: Sum of net interest income and noninterest income adjusted for selected exclusions, as reported on line item 27 of the PPNR Projections sub-schedule.

²⁷ Institutions that have adopted ASU 2016-13 should not report gains and losses on AFS and HTM securities, including changes in credit loss provisioning, as a component of PPNR.

DRAFT

Run-Off or Liquidating Businesses: operations that do not meet an accounting definition of “discontinued operations” but which the BHC, SLHC or IHC intends to exit. In order to facilitate the calculation of the proper net interest income on the *Net Interest Income sub-schedule*, report total balances related to discontinued operations as a negative number in “Other” in items 15 and 38 and the corresponding average rates earned in items 31 and 46. BHCs and IHCs should provide a detailed listing of the type (by corresponding line item on the *Net Interest Income sub-schedule*) of such balances reported as negative items in “Other” and the corresponding rates in the submission documentation.

A.7.a—PPNR Projections Sub-schedule

The PPNR Projections sub-schedule is based on standardized reporting of each component of PPNR, using business segment/line views as discussed below. If there is a difference between the FR Y-14 standardized reporting requirements and the BHCs’ or IHCs’ internal view used for internal capital planning purposes, the BHCs or IHCs should report data in the PPNR sub-schedules only per the standardized FR Y-14 requirements. The BHCs, SLHCs and IHCs are encouraged to provide data consistent with their own internal view in supporting documentation, accompanying the FR Y-14A Projections and discuss data differences. If the BHCs, SLHCs or IHCs are unable to comply with the requirements, they can request a temporary exemption. This guidance applies to PPNR Submission/Projections and PPNR Net Interest Income sub-schedules. Please see guidance for PPNR Metrics in the PPNR Metrics section of the instructions.

Revenue Components

Revenue items are divided into net interest income and noninterest income, with totals expected to reconcile with what would be reported in the FR Y-9C when adjusted for Valuation Adjustment for firm’s own debt under fair value option (FVO), loss resulting from trading shock exercise (if applicable), and operational risk expense adjustments required for PPNR purposes. For related items, reference PPNR Projections sub-schedule and related instructions for line items 29, 40, and 42. In the documentation supporting the FR Y-14A PPNR submission, BHCs and IHCs are encouraged to discuss operational risk losses reported as contra-revenues for FR Y-9C purposes and their reallocation to Operational Risk expense in accordance with the PPNR instructions. Do not report gains and losses on AFS and HTM securities, including other than temporary impairments (OTTI) estimates, as a component of PPNR.²⁸

Report all items either in the segments that generated them and/or segments that they were allocated to through funds transfer pricing (FTP). Net interest income allocation to the defined segments should be based on the cost of funds applicable to those segments as determined by the BHC, SLHC or IHC. Supporting Documentation instructions regarding methodology used should be provided in the memo required with the FR Y-14A Projections. Business segments and related sub-components do not have to correspond to but may include certain line items on the FR Y-9C schedule. The Business segment structure of the sub-schedule is defined by product/service (e.g., credit cards, investment banking) and client type (e.g., retail, medium size businesses); it is not defined by client relationship.

BHCs, SLHCs and IHCs are encouraged to note which line items contain Debit Valuation Adjustments (DVA) and/or Credit Valuation Adjustments (CVA) (note: these are different from fair value

²⁸ Institutions that have adopted ASU 2016-13 should not report gains and losses on AFS and HTM securities, including changes in credit loss provisioning, as a component of PPNR.

DRAFT

adjustment on the BHC's, SLHC's or IHC's own debt under the Fair Value Option (FVO) which is excluded from PPNR by definition), including amounts if available, and whether these are generated with the purpose to generate profit.

All revenue and expenses related to mortgage servicing rights (MSRs) and the associated noninterest income and noninterest expense line items should be evolved over the nine quarter projection horizons, and reported in the pre-provision net revenue (PPNR) schedules.

Gains or losses on loans held for sale and loans accounted for under the fair value option (HFS/FVO loans) should be reported in the relevant items on the PPNR Projections Sub-schedule in accordance with the BHC's, SLHC's or IHC's normal accounting procedures. Starting in January 2014, all BHCs, SLHCs and IHCs should project gains or losses on HFS/FVO loans for all nine quarters using only the macroeconomic scenario without reference to the global market shock.

Business Segment Definitions

Subject to applicable thresholds, reporting of net interest income and noninterest income items is requested based on a business segment/line view, with business segments/lines defined as follows:

- As general guidance, small business clients are those with annual sales of less than \$10 million. Business, government, not-for-profit, and other institutional entities of medium size are those with annual sales between \$10 million and \$2 billion. Large business and institutional entities are those with annual sales of more than \$2 billion. If a BHC's, SLHC's or IHC's internal reporting for these client segments deviates from this general guidance, continue to report according to internal definitions and describe how the BHC, SLHC or IHC defined these or similar client segments and the scope of related business segments/lines (internal and those defined in the FR Y-14 PPNR sub-schedules) in the memo supporting the FR Y-14A submission.
- A BHC or SLHC may include public funds in the segment reporting based on the type of the relationship that exists between the public funds and the BHC or SLHC. For example, if the BHC, SLHC or IHC acts in a custodial or administrative capacity, the BHC, SLHC or IHC may report public funds in Investor Services. If a BHC, SLHC or IHC is involved in the management of funds, the BHC, SLHC or IHC may report the public funds in Investment Management.

Net Interest Income by Business Segment (unless specified otherwise, all numbers are global).

Line item 1 Retail and Small Business

This item is a shaded cell and is derived, per column, from the sum of items 1A and 1G.

Report in the appropriate sub-item all net interest income related to retail and small business banking and lending, including both ongoing as well as run-off and liquidating businesses²⁹. Exclude any revenues related to Wealth Management/Private Banking (WM/PB) clients even if they are internally classified as retail. BHCs, SLHCs or IHCs may include such revenues in WM/PB line items instead. In case of WM/PB mortgage repurchase contra-revenues, if any, report them as outlined in the PPNR Projection sub-schedule.

Line item 1A Domestic

²⁹ See "Commonly Used Terms and Abbreviations" for the definition.

DRAFT

This item is a shaded cell and is derived, per column, from the sum of items 1B through 1F.

Line item 1B Credit and Charge Cards

Report net interest income from domestic BHC, SLHC or IHC issued credit and charge cards to retail customers including those that result from partnership agreements. May include revenue that is generated on domestic accounts due to foreign exchange transactions. Exclude the following:

- other unsecured borrowing and debit cards;
- small business cards (report in Other Retail and Small Business Lending, item 1F);
- wholesale and commercial cards (report in Treasury Services, item 8).
- Cards to Wealth Management/Private Banking clients (report in Wealth Management/Private Banking, line 19B)

Line item 1C Mortgages

Report net interest income from domestic residential mortgage loans offered to retail customers.

Line item 1D Home Equity

Report net interest income from domestic home equity loans and lines of credit (HELOANS/HELOCs) provided to retail customers.

Line item 1E Retail and Small Business Deposits

Report net interest income from domestic branch banking and deposit-related products and services provided to retail and small business customers. Include debit card revenues in this line. May include revenue that is generated on domestic accounts due to foreign exchange transactions. This item does not include any lending revenues.

Line item 1F Other Retail and Small Business Lending

Report net interest income from other domestic retail and small business lending products and services. These include, but are not limited to, small business cards, loans, auto loans, student loans, or personal unsecured credit. All domestic lending revenues not captured in Credit Cards, Mortgages, and Home Equity should be reported here.

Line item 1G International Retail and Small Business

Report net interest income from international retail and small business. Includes, but is not limited to, all international revenues from credit/charge/debit cards, mortgages, home equity, branch and deposit services, auto, student, and small business loans.

Line item 2 Commercial Lending

Report net interest income from lending products and services provided to business, government, not-for-profit, and other institutional entities of medium size, as well as to commercial real estate investors and owners. Exclude treasury, deposit, and investment banking services.

Line item 3 Investment Banking

Report in the appropriate sub-item all net interest income generated from investment banking services provided to business and institutional entities of both medium and large size. Include revenues from new issue securitizations for third parties. Business lines are defined as follows:

- Advisory: Corporate strategy and financial advisory, such as services provided for mergers and acquisitions (M&A), restructuring, financial risk management, among others.
- Equity Capital Markets: Equity investment banking services (e.g., IPOs or secondary offerings).

DRAFT

- Debt Capital Markets: Generally non-loan debt investment banking services.
- Syndicated/Corporate Lending: Lending commitments to larger corporate clients, including event or transaction-driven lending (e.g., to finance M&A, leveraged buyouts, bridge loans). Generally, all syndicated lending origination activity should be included here (not in Commercial Lending).

Line item 4 Merchant Banking/ Private Equity

Report net interest income from private equity (PE), real estate, infrastructure, and principal investments in hedge funds. May include principal investment related to merchant banking activities.

Line item 5 Sales and Trading

This item is a shaded cell and is derived, per column, from the sum of items 5A and 5B.

Report in the appropriate sub-item all net interest income generated from sales and trading activities. Any interest income from carry should be included in Sales & Trading net interest income. May include short-term trading made for positioning or profit generation related to the Sales & Trading activities in this line item.

Line item 5A Prime Brokerage

Report net interest income generated from securities financing, securities lending, custody, clearing, settlement, and other services for hedge funds and other prime brokerage clients. Include all prime brokerage revenues in this line and not in any other business segments/lines.

Line item 5B Other

Report net interest income from all other Sales & Trading activities that are not reported in item 5A above. These include, but are not limited to:

- Equity trading activity not reported under line item 5A Prime Brokerage.
- Fixed income trading (e.g., rates, credits).
- Other: e.g., FX/Currencies and Commodities.

Line item 6 Investment Management

Report all net interest income generated from investment management activities. Business lines are defined as follows:

- Asset Management: Professional management of mutual funds and institutional accounts. Institutional clients may include endowments, not-for-profit entities, governments, and others.
- Wealth Management/Private Banking (WM/PB): Professional portfolio management and advisory services for individuals. Individual clients may be defined as mass market, affluent, and high net worth. Activities may also include tax planning, savings, inheritance, and wealth planning, among others. May include deposit and lending services to WM/PB clients here and retail brokerage services for both WM/PB and non WM/PB clients.

Line item 7 Investment Services

Report all net interest income generated from investment servicing. Exclude prime brokerage revenues. Business lines are defined as follows:

- Asset Servicing: Custody, fund services, securities lending, liquidity services, collateral management; and other asset servicing. Include record keeping services for 401K and employee benefit plans, but exclude funding or guarantee products offered to such clients.
- Issuer Services: Corporate trust, shareowner services, depository receipts, and other issuer services.
- Other Investment Services: Clearing and other investment services.

DRAFT

Line item 8 Treasury Services

Report all net interest income from cash management, global payments, working capital solutions, deposit services, and trade finance from business and institutional entities of both medium and large size. Include wholesale/corporate and commercial cards.

Line item 9 Insurance Services

Report all net interest income from insurance activities including, but not limited to, individual (e.g., life, health), auto and home (property and casualty), title insurance and surety insurance, and employee benefits insurance.

Line item 10 Retirement/Corporate Benefit Products

Report premiums, fees, and other net interest income generated from retirement and corporate benefit funding products, such as annuities, guaranteed interest products, and separate account contracts. The fees/revenues that may be recorded here are generally generated as a result of the BHC, SLHC or IHC accepting risks related to actuarial assumptions or the estimation of market returns where guarantees of future income streams have been made to clients.

Line item 11 Corporate/Other

Report net interest income associated with:

- Capital and asset-liability management (ALM) activities. Among other items, may include investment securities portfolios (but not gains and losses on AFS and HTM securities, including OTTI,³⁰ as these are excluded from PPNR by definition). Also may include principal investment supporting the corporate treasury function to manage firm-wide capital, liquidity, or structural risks.
- Run-off or liquidating businesses³¹ (but exclude retail and small business run-off/liquidating businesses, per Retail and Small Business segment definition)
- Non-financial businesses (e.g., publishing, travel services)
- Corporate support functions (e.g., Human Resources, IT)
- Other non-core revenues not included in other segments (e.g., intersegment eliminations).

Line item 12 Optional Immaterial Business Segments

BHCs, SLHCs and IHCs have the option to report less material business segment revenue in Optional Immaterial Business Segments. The reported total optional immaterial business segment revenue relative to total revenue cannot exceed 10 percent. If the total immaterial business segment revenue relative to total revenue would be greater than 10 percent in any of the most recent four actual quarters as provided by the BHC, SLHC or IHC in the FR Y-14Q, report data for the largest business segment among the immaterial business segments for all quarters in the PPNR Projections and PPNR Metrics sub-schedules such that the amount reported in the Optional Immaterial Business segments line items does not exceed 10 percent. BHCs, SLHCs and IHCs should provide comprehensive information in the Supporting Documentation Instructions on which business segments are included in the Optional Immaterial Business segments line items in both FR Y-14Q and FR Y-14A schedules, their relative contribution to the totals reported in both schedules and the manner in which the revenues were projected for FR Y-14A purposes. List segments included in this line item in Footnote

³⁰ Institutions that have adopted ASU 2016-13 should not report gains and losses on AFS and HTM securities, including changes in credit loss provisioning, as a component of PPNR.

³¹ See "Commonly Used Terms and Abbreviations" for the definition.

DRAFT

7.

Line item 13 Total Net Interest Income

This item is a shaded cell and is derived, per column, from the sum of items 1, 2 through 5, and 6 through 12. Line item 13, per column, should equal item 49 on PPNR NII Sub-schedule, if completed.

Noninterest Income by Business Segment (unless specified otherwise, all numbers are global).

Line item 14 Retail and Small Business

This item is a shaded cell and is derived, per column, from the sum of items 14A and 14T.

Line item 14A Domestic

This item is a shaded cell and is derived, per column, from the sum of items 14B, 14E, 14O, and 14S.

Report in the appropriate sub-item all domestic revenues related to retail and small business banking and lending, including both ongoing as well as run-off and liquidating businesses³². Exclude any revenues related to Wealth Management/Private Banking (WM/PB) clients even if they are internally classified as retail. BHCs, SLHCs and IHCs may include such revenues in WM/PB line items instead. In case of WM/PB mortgage repurchase contra-revenues, if any, report them as outlined in the PPNR Projection sub-schedule.

Line item 14B Credit and Charge Cards

This item is a shaded cell and is derived, per column, from the sum of items 14C and 14D.

Report in the appropriate sub-item all noninterest income generated from domestic BHC, SLHC or IHC issued credit and charge cards to retail customers including those that result from a partnership agreements. May include revenue that is generated on domestic accounts due to foreign exchange transactions and corporate cards. Exclude the following:

- other unsecured borrowing and debit cards;
- small business cards (report in Other Retail and Small Business Lending, item 14S);
- wholesale and commercial cards (report in Treasury Services, item 21);
- Cards to Wealth Management/Private Banking clients (report in Wealth Management/Private Banking, line 19B)

Line item 14C Credit and Charge Card Interchange Revenues - Gross

Report interchange revenues from all domestic BHC, SLHC or IHC issued credit and charge cards including those that result from a partnership agreement. Report before any contra-revenues (e.g., rewards, etc.).

Line item 14D Other

Report all other fee income and revenue earned from credit and charge cards not captured in item 14C.

Line item 14E Mortgage and Home Equity

This item is a shaded cell and is derived, per column, from the sum of items 14F, 14I and 14N. Report in the appropriate sub-item noninterest income generated from domestic residential mortgage loans offered to retail customers and domestic home equity loans and lines of credit (HELOANs/HELOCs) provided to retail customers.

³² See “Commonly Used Terms and Abbreviations” for the definition.

DRAFT

Line item 14F Production

This item is a shaded cell and is derived, per column, from the sum of items 14G and 14H.

Line item 14G Gains/Losses on Sale

Report gains/(losses) from the sale of domestic mortgages and home equity originated through all production channels (retail, broker, correspondent, etc.) with the intent to sell. Such gains/losses should include deferred fees and costs that are reported as adjustments to the carrying balance of the sold loan, fair value changes on loan commitments with rate locks that are accounted for as derivatives, fair value changes on mortgage loans held-for-sale designated for fair value treatment, lower-of-cost or market adjustments on mortgage loans held-for-sale not designated for fair value treatment, fair value changes on derivative instruments used to hedge loan commitments and held-of-sale mortgages, and value associated with the initial capitalization of the MSR upon sale of the loan.

Line item 14H Other

Report all other fee income and revenue earned from mortgage production not captured in item 14G.

Line item 14I Servicing

This item is a shaded cell and is derived, per column, from the sum of items 14J, 14K, 14L, and 14M.

Line item 14J Servicing & Ancillary Fees

Report fees received from activities relating to the servicing of mortgage loans, including (but not limited to) the collection principal, interest, and escrow payments from borrowers; payment of taxes and insurance from escrowed funds; monitoring of delinquencies; execution of foreclosures; temporary investment of funds pending distribution; remittance of fees to guarantors, trustees, and others providing services; and accounting for and remittance of principal and interest payments to the holders of beneficial interests in the financial assets.

Line item 14K MSR Amortization

Include economic amortization or scheduled and unscheduled payments, net of defaults under both FV and LOCOM accounting methods.

Line item 14L MSR Value Changes due to Changes in Assumptions/Model Inputs/Other Net of Hedge Performance

Report changes in the MSR value here and not in any other items. Report changes in the MSR hedges here and not in any other items. Include MSR changes under both FV and LOCOM accounting methods.

Line item 14M Other

Report all other revenue earned from servicing activities not captured in lines 14J through 14L.

Line item 14N Provisions to Repurchase Reserve/Liability for Residential Mortgage Representations and Warranties (contra-revenue)

Report provisions to build any non-litigation reserves/accrued liabilities that have been established for losses related to sold or government-insured residential mortgage loans (first or second lien). Do not report such provisions in any other items; report them only in line items 14N or 30, as

DRAFT

applicable. Exclude all provisions to litigation reserves/liability for claims related to sold residential mortgages (report in item 29).

Line item 14O Retail and Small Business Deposits

This item is a shaded cell and is derived, per column, from the sum of items 14P, 14Q and 14R. Report in the appropriate sub-item noninterest income from domestic branch banking and deposit-related products and services provided to retail and small business customers. Include debit card revenues in this line. May include revenue that is generated on domestic accounts due to foreign exchange transactions.

Line item 14P Non-Sufficient Funds/Overdraft Fees – Gross

Report noninterest income from fees earned from insufficient fund deposit balances and overdrawn client deposit accounts. Report before any contra-revenues (e.g., waivers, etc.).

Line item 14Q Debit Interchange – Gross

Report noninterest income from interchange fees earned on debit cards. Report before any contra-revenues (e.g., rewards, etc.).

Line item 14R Other

Among items included here are debit card contra-revenues and overdraft waivers, as applicable.

Line item 14S Other Retail and Small Business Lending

Report noninterest income from other domestic retail and small business lending products and services. These include, but are not limited to, small business cards, other small business loans, auto loans, student loans, or personal unsecured credit.

Line item 14T International Retail and Small Business

Report noninterest income from international retail and small business. Includes, but is not limited to, all revenues from credit/charge/debit cards, mortgages, home equity, branch and deposit services, auto, student, and small business loans.

Line item 15 Commercial Lending

Report noninterest income from lending products and services provided to business, government, not-for-profit, and other institutional entities of medium size, as well as to commercial real estate investors and owners. Exclude treasury, deposit, and investment banking services provided to commercial lending clients.

Line item 16 Investment Banking

This item is a shaded cell and is derived, per column, from the sum of items 16A through 16D. Report in the appropriate sub-item noninterest income generated from investment banking services provided to business and institutional entities of both medium and large size. Include revenues from new issue securitizations for third parties.

Line item 16A Advisory

Corporate strategy and financial advisory, such as services provided for mergers and acquisitions (M&A), restructuring, financial risk management, among others.

Line item 16B Equity Capital Markets

Equity investment banking services (e.g., IPOs or secondary offerings).

DRAFT

Line item 16C Debt Capital Markets

Generally non-loan debt investment banking services.

Line item 16D Syndicated/Corporate Lending

Lending commitments to larger corporate clients, including event or transaction-driven lending (e.g., to finance M&A, leveraged buyouts, bridge loans). Generally, all syndicated lending origination activity should be included here (not in Commercial Lending).

Line item 17 Merchant Banking/ Private Equity

This item is a shaded cell and is derived, per column, from the sum of items 17A through 17C.

Report in the appropriate sub-item revenues from the sponsorship of, management of, or from investing in, distinct long-term investment vehicles, such as real estate funds, private equity funds, hedge funds or similar vehicles. Also include direct long-term investments in securities and assets made primarily for capital appreciation, or investments where the BHC, SLHC or IHC is likely to participate directly in corporate governance. Do not include revenues from sales & trading operations, corporate lending outside of a fund structure, investing in a HTM or AFS securities portfolio, brokerage or mutual fund operations.

Line item 17A Net Investment Mark-to-Market

Report the net gain or loss from sale or from the periodic marking to market of Merchant Banking/Private Equity investments.

Line item 17B Management Fees

Report fees and commissions paid by third parties to the BHC, SLHC or IHC in connection with sale, placement or the management of above described investment activities.

Line item 17C Other

Report any noninterest income items not included in items 17A and 17B. Also include the BHC's or IHC's proportionate share of the income or other adjustments from its investments in equity method investees.

Line item 18 Sales and Trading

This item is a shaded cell and is derived, per column, from the sum of items 18A, 18D, 18H, and 18K. Report in the appropriate sub-item noninterest income generated from sales and trading activities. Any interest income from carry should be included in Sales & Trading under net interest income. May include short-term trading made for positioning or profit generation related to the Sales & Trading activities in this line item.

Line item 18A Equities

This item is a shaded cell and is derived, per column, from the sum of items 18B and 18C.

Line item 18B Commission and Fees

Report commissions and fees. Exclude prime brokerage services.

Line item 18C Other

Report all noninterest income for equities sales and trading, excluding prime brokerage (to be

DRAFT

reported as a separate line item) and excluding commissions and fees. This includes trading profits and other noninterest non-commission income.

Line item 18D Fixed Income

This item is a shaded cell and is derived, per column, from the sum of items 18E, 18F, and 18G. Report in the appropriate sub-item commissions, fees, and trading gains and losses on rates, credit, and other fixed income products. Exclude prime brokerage services.

Line item 18E Rates

Generally U.S. Treasury, investment grade sovereign, U.S. agency bonds, and interest rate swaps. Rates revenues related to trading activities outside of the Sales & Trading division need not be included into the Rates trading in this section, but describe where they are allocated in the BHC's, SLHC's or IHC's documentation supporting the FR Y-14A submission.

Line item 18F Credit

Generally corporate bonds, loans, ABS, muni, emerging markets, CDS. If a BHC, SLHC or IHC classifies some of the credit related trading (such as distressed debt) in segments other than "Sales & Trading," it can continue to report it as in its internal financial reports but indicate where they are reported in the documentation supporting FR Y-14A submission.

Line item 18G Other

Report other fixed income products if not included above (e.g., FX/Currencies).

Line item 18H Commodities

This item is a shaded cell and is derived, per column, from the sum of items 18I and 18J.

Line item 18I Commission and Fees

Report commissions, fees, and trading gains and losses on commodity products. Exclude prime brokerage services.

Line item 18J Other

Report other noninterest income generated from commodity products, excluding prime brokerage services.

Line item 18K Prime Brokerage

This item is a shaded cell and is derived, per column, from the sum of items 18L and 18M. Report in the appropriate sub-item noninterest income from securities financing, securities lending, custody, clearing, settlement, and other services for hedge funds and other prime brokerage clients. Include all prime brokerage revenues in this line and not in any other business segments/lines.

Line item 18L Commission and Fees

Report commissions and fees on prime brokerage services.

Line item 18M Other

Report other noninterest income generated from prime brokerage services.

Line item 19 Investment Management

This item is a shaded cell and is derived, per column, from the sum of items 19A and 19B. Report in the appropriate sub-item all noninterest income generated from investment management activities.

DRAFT

Line item 19A Asset Management

Professional management of mutual funds and institutional accounts. Institutional clients may include endowments, not-for-profit entities, governments, and others.

Line item 19B Wealth Management/Private Banking (WM/PB)

Professional portfolio management and advisory services for individuals. Individual clients may be defined as mass market, affluent, and high net worth. Activities may also include tax planning, savings, inheritance, and wealth planning, among others. May include deposit and lending services to WM/PB clients here and retail brokerage services for both WM/PB and non WM/PB clients.

Line item 20 Investment Services

This item is a shaded cell and is derived, per column, from the sum of items 20A, 20D, and 20E. Report in the appropriate sub-item all noninterest income generated from investment servicing. Exclude prime brokerage revenues.

Line item 20A Asset Servicing

This item is a shaded cell and is derived, per column, from the sum of items 20B and 20C. Report in the appropriate sub-item all noninterest income from custody, fund services, securities lending, liquidity services, collateral management, and other asset servicing. Include record keeping services for 401K and employee benefit plans, but exclude funding or guarantee products offered to such clients.

Line item 20B Securities Lending

Report noninterest income generated from securities lending.

Line item 20C Other

Report all other noninterest income asset servicing, excluding securities lending.

Line item 20D Issuer Services

Corporate trust, shareowner services, depository receipts, and other issuer services.

Line item 20E Other

Report noninterest income from clearing and other investment services not included above.

Line item 21 Treasury Services

Report cash management, global payments, working capital solutions, deposit services, and trade finance from business and institutional entities of both medium and large size. Include wholesale and commercial cards.

Line item 22 Insurance Services

Report all noninterest income from insurance activities including, but not limited to, individual (e.g., life, health), auto and home (property and casualty), title insurance and surety insurance, and employee benefits insurance.

Line item 23 Retirement/Corporate Benefit Products

Report premiums, fees, and other noninterest income generated from retirement and corporate benefit funding products, such as annuities, guaranteed interest products, and separate account contracts. The fees/revenues that may be recorded here are generally generated as a result of the BHC, SLHC or IHC accepting risks related to actuarial assumptions or the estimation of market returns where guarantees

DRAFT

of future income streams have been made to clients.

Line item 24 Corporate/Other

Report noninterest income associated with:

- Capital and asset-liability management (ALM) activities. Among other items, may include investment securities portfolios (but not gains and losses on AFS and HTM securities, including OTTI, as these are excluded from PPNR by definition).³³ Also may include principal investment supporting the corporate treasury function to manage firm-wide capital, liquidity, or structural risks.
- Run-off or liquidating businesses¹² (but exclude retail and small business run-off/liquidating businesses, per Retail and Small Business segment definition)
- Non-financial businesses (e.g., publishing, travel services)
- Corporate support functions (e.g., Human Resources, IT)
- Other non-core revenues not included in other segments (e.g., intersegment eliminations).

Line item 25 Optional Immaterial Business Segment

BHCs, SLHCs and IHCs have the option to report less material business segment revenue in separate line items "Optional Immaterial Business Segments". The reported total optional immaterial business segment revenue relative to total revenue cannot exceed 10 percent. If the total immaterial business segment revenue relative to total revenue would be greater than 10 percent in any of the most recent four actual quarters as provided by the BHC, SLHC or IHC in the FR Y-14Q, report data for the largest business segment among the immaterial business segments for all quarters in the PPNR Projections and PPNR Metrics sub-schedules such that the amount reported in the Optional Immaterial Business segments line items does not exceed 10 percent. BHCs, SLHCs and IHCs should provide comprehensive information in the Supporting Documentation on which business segments are included in the Optional Immaterial Business segments line items in both FR Y-14Q and FR Y-14A schedules, their relative contribution to the totals reported in both schedules and the manner in which the revenues were projected for FR Y-14A purposes. List segments included in this line item in Footnote 7.

Line item 26 Total Noninterest Income

This item is a shaded cell and is derived, per column, from the sum of items 14, 15, 16, 17, 18, 19, 20, and 21 through 25. Excludes Valuation Adjustment for firm's own debt under fair value option (FVO) reported in item 40 and the result of trading shock exercise (where applicable), as it is reported in item 42.

Line item 27 Total Revenues

This item is a shaded cell and is derived, per column, from the sum of items 13 and 26.

Noninterest Expense Components

Noninterest Expense figures are to be broken out as detailed on the sub-schedule. The total is expected to reconcile with what would be reported in the FR Y-9C when adjusted for certain items. As presented on the PPNR sub-schedules, the adjustments include exclusions of goodwill impairment and adjustments related to operational risk expense required for PPNR purposes. For the related items, reference PPNR Projections sub-schedule and related instructions for the line items 29 and 41.

³³ Institutions that have adopted ASU 2016-13 should not report gains and losses on AFS and HTM securities, including changes in credit loss provisioning, as a component of PPNR.

DRAFT

Expense data on the PPNR Submission sub-schedule are only intended to be reported as firm-wide BHC, SLHC or IHC expenses, with exception of line item 34A, i.e. Marketing Expense for Domestic Credit Cards. This line item is for Domestic Credit Cards business line only. See the description of the Domestic Credit Card business line in the Business Segment Definitions section of the document.

If the Worker's Compensation expense is an expected item, or is regularly budgeted and paid out similar to an insurance premium or accrual of agreed-upon expenses, then a BHC, SLHC or IHC would report it as Compensation expense or line item 28. If the Worker's Compensation results from a legal settlement, or is part of a large payout to prevent litigation, solve a complaint, or satisfy a penalty or fine, then a BHC, SLHC or IHC would report it in line item 29 with Operational Risk Expenses.

Line item 28 Compensation Expense

This item is a shaded cell and is derived, per column, from the sum of items 28A through 28E.

Line item 28A Salary

Exclude stock based and cash variable pay compensation and report in items 28D and 28E, respectively.

Line item 28B Benefits

Exclude stock based and cash variable pay compensation and report in items 28D and 28E, respectively.

Line item 28C Commissions.

Report commissions only in "Commissions" line item 28C; do not report commissions in any other compensation line items.

Line item 28D Stock Based Compensation

Report all expenses related to stock based compensation as defined by ASC Topic 718, Compensation-Stock Compensation (formerly FASB Statement No. 123(R), *Shared-Based Payment*).

Line item 28E Cash Variable Pay

Report expenses related to all discretionary variable compensation paid (or to be paid) in the form of cash. Include deferred variable compensation plans not associated with BHC, SLHC or IHC stock.

Line item 29 Operational Risk Expense

This item is a shaded cell and is derived, per column, from the item on the OpRisk Projected Losses Sub-schedule. All operational loss items, including operational losses that are contra revenue amounts or cannot be separately identified, should be reported in the operational risk expense. Any legal consultation or retainer fees specifically linked to an operational risk event should be included in the Operational Risk Expense. Include all provisions to litigation reserves/liability for claims related to sold residential mortgages and all litigation settlements and penalties in this line item and not in any other line item. The reporting of the operational risk expense item will not necessarily be consistent with FR Y-9C reporting.

Line item 30 Provisions to Repurchase Reserve/Liability for Residential Mortgage Representations and Warranties

DRAFT

Provisions to build any non-litigation reserves/accrued liabilities that have been established for losses related to sold or government-insured residential mortgage loans (first or second lien). Do not report such provisions in any other items; report them only in line items 14N or 30, as applicable. Exclude all provisions to litigation reserves/liability for claims related to sold residential mortgages (report in item 29).

Line item 31 Professional and Outside Services Expenses

Among items included are routine legal expenses (i.e., legal expenses not related to operational losses), audit and consulting fees, and other fees for professional services.

Line item 32 Expenses of Premises and Fixed Assets

Report expenses of premises and fixed assets, as defined in the FR Y-9C, Schedule HI, item 7.b.

Line item 33 Amortization Expense and Impairment Losses for Other Intangible Assets

Report amortization expense and impairment losses for other intangible assets, as defined in the FR Y-9C, Schedule HI, item 7.c.(2).

Line item 34 Marketing Expense

This item is a shaded cell and is derived, per column, from the sum of items 34A and 34B.

Line item 34A Domestic Credit and Charge Card Marketing Expense

Include domestic BHC, SLHC or IHC issued credit and charge cards, as defined in item 1B, including those that result from a partnership agreement. Include both direct and allocated expenses. Report any expenses that are made to expand the company's card member and/or merchant base, facilitate greater segment penetration, enhance the perception of the company's credit card brand, and/or increase the utilization of the existing card member base across the spectrum of marketing and advertising mediums.

Line item 34B Other

Report all marketing expenses not related to domestic credit and charge cards captured in line 34A.

Line item 35 Other Real Estate Owned Expense

All expenses associated with other real estate owned that would normally be reported in the FR Y-9C, Schedule HI, item 7.d., "Other noninterest expense".

Line item 36 Provision for Unfunded Off-Balance Sheet Credit Exposures (to build/decrease item 141 (BHCKB557) in Balance Sheet)

Report the provision for credit losses on off-balance sheet credit exposures normally reported as one of the items in FR Y-9C, Schedule HI, item 7.d.

Line item 37 Other Noninterest Expense

Provide a further break out of significant items included in Other Noninterest Expense in footnote 4, such that no more than 5% of Noninterest Expense are reported without further breakout.

Report the line item breakout for the combined 9 quarters of projected "Other noninterest expense" (line item 37). A quarterly breakout of these data should be included in the Supporting Documentation.

DRAFT

Line item 38 Total Noninterest Expense

This item is a shaded cell and is derived, per column, from the sum of items 28, 29 through 34, and 35 through 37. Excludes Goodwill Impairment included in item 41.

Line item 39 Projected PPNR

This item is a shaded cell and is derived, per column, from item 27 less 38. By definition, PPNR will calculate as net interest income plus noninterest income less noninterest expense, excluding items broken out in items 40 and 41.

Line item 40 Valuation Adjustment for Firm's Own Debt Under Fair Value Option (FVO)

List segments from which item was excluded in Footnote 9. In footnote 27, list FR Y-9C, Schedule HI items in which this amount is normally reported and has been excluded from in this reporting view.

Line item 41 Goodwill Impairment

Report impairment losses for goodwill, as defined in the FR Y-9C, Schedule HI, item 7.c.(1). Under GAAP (ASC 350-20-35-30), "Goodwill of a reporting unit shall be tested for impairment between annual tests if an event occurs or circumstances change that would more likely than not reduce the fair value of a reporting unit below its carrying amount." However, it is acceptable for purposes of this exercise to provide annual estimates as long as the resulting quarterly capital projections would not differ materially from those generated using quarterly impairment projections.

Line item 42 Loss Resulting from Trading Shock Exercise (if applicable)

This item is a shaded cell and is derived, per column, from the sum of items 58 through 62 on the Sub-schedule 1.a, Income Statement. BHCs, SLHCs and IHCs should not report changes in value of the MSR asset or hedges within the trading book. List segments from which item was excluded in Footnote 25.

A.7.b—PPNR Net Interest Income (NII) Sub-schedule

BHCs, SLHCs and IHCs for which deposits comprise 25 percent or more of total liabilities for any period reported in any of the four most recent FR Y-14Q are required to submit the Net Interest Income sub-schedule. BHCs and IHCs should complete non-shaded cells only; all shaded cells with embedded formulas will self-populate.

This sub-schedule requires BHCs, SLHCs and IHCs to provide average asset and liability balances and average yields to calculate net interest income. The total net interest income calculated should equal the total net interest income reported using a business segment/line view in the PPNR Projections sub-schedule.

The average balances and rates are meant to reflect the average over each quarter as best as possible. The Federal Reserve understands that because of changes in balances over the period, the simple multiplication of average loan rates and balances may not yield the actual interest income. In these cases, the BHCs, SLHCs or IHCs may report the average loan rate so that it equals a weighted average rate over the period and the interest income total for each quarter reflects historical results or the BHC's, SLHC's or IHC's projection, as applicable. If the average rates are materially impacted by large shifts in balances over the period, highlight this in documentation supporting the FR Y-14A submission.

Rates on this sub-schedule are intended to provide a product level view exclusive of transfer pricing

DRAFT

activity and should be reported on a gross basis. The reporting of net interest income on the PPNR Projections and PPNR Submission Sub-schedules provide a business line view and should be reported net of transfer pricing adjustments.

Average Assets

BHCs, SLHCs and IHCs should reference FR Y-9C and other definitions provided in the PPNR Net Interest Income sub-schedule when completing this section. Align the asset categories definitions, where no FR Y9C code is provided, with those on the Balance Sheet sub-schedule of the FR Y-14A Summary Schedule. The FR Y-9C code references are intended only to provide guidance for the types of items to be included or excluded; but NOT the type of balance to be provided. All requested balance items are averages.

In the case of loans, align definitions with the “total loans” section of the Balance Sheet sub-schedule. Include purchased credit impaired loans PCI loan balances and the interest income recognized on these loans.³⁴ However, report the aggregate of all nonaccrual loans as line item 9, rather than including them in each loan type. Although nonaccrual loans are reported in aggregate for reporting purposes, BHCs, SLHCs and IHCs are encouraged to provide details on the nonaccrual loans by Balance Sheet sub-schedule definition, if available, in the documentation supporting their FR Y-14A submission.

Balance sheet forecasts are intended to be reported in a manner consistent with how the BHC, SLHC or IHC reports such balances on the FR-Y9C based on the BHCK references in the notes column of the balance sheet sub-schedule, or otherwise in accordance with FR Y-14A reporting instructions where no references are provided. Such balances should then be reported consistently on the PPNR Net II Sub-schedule (in both FR Y-14A and FR Y-14Q schedules). If this reporting results in recording certain non-earning assets in the average trading assets line on the PPNR Net II sub-schedule (or any other line item with an associated rate), a BHC, SLHC or IHC should simply reduce the weighted average rate applied to that balance to ensure that income forecasts are calculated appropriately.

Average balances on the PPNR Net Interest Income sub-schedules (both on FR Y-14Q and FR Y-14A) are intended to be reported in a manner consistent with items on the Balance Sheet sub-schedule of FR Y-14A schedule. As such, average asset balances on PPNR Net Interest Income sub-schedule are to reconcile to average of asset balances based on FR Y-9C BHCK2170 (which reflects fair value of AFS securities).

Line item 1 First Lien Residential Mortgages (in domestic offices)

Report the average balance of first lien residential mortgages in domestic offices (as defined in the FR Y-9C, Schedule HC-C, item 1.c.(2)(a), column B).

Line item 2 Second/Junior Lien Residential Mortgages (in domestic offices)

This item is a shaded cell and is derived, per column, from the sum of items 2A and 2B.

Line item 2A Closed-End Junior Liens

Report the average balance of second/junior lien residential mortgages in domestic offices (as

³⁴ This sentence and reference to purchased credit-impaired loans does not apply to institutions that have adopted ASU 2016-13, and will be removed upon full adoption of CECL by all institutions.

DRAFT

defined in the FR Y-9C, Schedule HC-C, item 1.c.(2)(b), column B).

Line item 2B Home Equity Lines of Credit (HELOCs)

Report the average balance of home equity lines of credit in domestic offices (as defined in the FR Y-9C, Schedule HC-C, item 1.c.(1), column B).

Line item 3 C&I Loans

Report the average balance of C&I Graded, Small Business (Scored/Delinquency Managed), Corporate Card, and Business Card loans.

Line item 4 CRE Loans (in domestic offices)

Report the average balance of CRE loans in domestic offices as defined in the FR Y-9C, Schedule HC-C, items 1.a.(1), 1.a.(2), 1.d, 1.e.(1), and 1.e.(2), column B.

Line item 5 Credit Cards

Report the average balance of credit cards (as defined in the FR Y-9C, Schedule HC-C, item 6.a, column A).

Line item 6 Other Consumer

This item is a shaded cell and is derived, per column, from the sum of items 6A through 6C.

Line item 6A Auto Loans

Report the average balance of auto loans as defined in the FR Y-9C, Schedule HC-C, item 6.c, column A.

Line item 6B Student Loans

Report the average balance of student loans.

Line item 6C Other (including loans backed by securities (non-purpose lending))

Report the average balance of other loans.

Line item 7 Real Estate Loans (not in domestic offices)

This item is a shaded cell and is derived, per column, from sum of items 7A and 7B. (Also, defined as FR Y-9C, Schedule HC-C, item 1, column A, less above items 1, 2, 5, and FR Y-9C, Schedule HC-C, item 1.b, column B.)

Line item 7A Residential Mortgages (first and second lien)

Report the average balance of first and second lien residential mortgages not in domestic offices.

Line item 7B Other

Report the average balance of other real estate loans not in domestic offices.

Line item 8 Other Loans and Leases

Report the average balance of other loans and leases. Include loans secured by farmland as defined in FR Y-9C, Schedule HC-C, item 1.b, column B, and other loans not accounted for in the above categories. If total net interest income does not reconcile to FR Y-9C total per PPNR definition using fair value average balances for AFS securities, use "Other" balances (line items 15 and 38) and corresponding rates (line items 31 and 46) to offset the difference.

Line item 9 Nonaccrual Loans

Report the average balance of nonaccrual loans, as defined in the FR Y-9C, Schedule HC-N, item item

DRAFT

10 (Column C) less Schedule HC-N, item 9 (Column C). Institutions are to provide additional details within the supporting documentation; the composition of the non-accrual loans by key loan type over the reported time periods for each of the scenarios.

Line item 10 Securities (AFS and HTM) – Treasuries and Agency Debentures

Report the average balance of AFS/HTM balances in Treasury and Agency debentures, as defined in the FR Y-9C, Schedule HC-B, items 1 and 2.

Line item 11 Securities (AFS and HTM) – Agency RMBS (both CMOs and pass-throughs)

Report the average balance of AFS/HTM balances in Agency RMBS, as defined in the FR Y-9C, Schedule HC-B, items 4.a.(1), 4.a.(2), 4.b.(1) and 4.b.(2), columns A and D.

Line item 12 Securities (AFS and HTM) - Other

Report the average balance of all AFS/HTM investments not reported in items 10 and 11, defined in the FR Y-9C, Schedule HC, items 2.a and 2.b less Net II Sub-schedule items 10 & 11.

Institutions that have elected ASU 2016-01 should report average balances from equity securities with readily determinable fair values not held for trading in this item.

Line item 13 Trading Assets.

Report the average balance of trading assets as defined in the FR Y-9C, Schedule HC-K, item 4.a.

Line item 14 Deposits with Banks and Other

Report the average balance of deposits with banks.

Line item 15 Other Interest/Dividend-Bearing Assets

Report the average balance of other interest/dividend-bearing asset not accounted for in the above categories (e.g. Fed Funds Sold, Repos, etc.). In Footnote 2, breakout and explain nature of significant items included in other average interest-bearing asset balances such that no more 5% of total average interest-bearing asset balances are reported without a further breakout.

Line item 16 Other Assets

Report the average balance of all non-interest bearing assets. Line 16 of the Net Interest Income Sub-schedule is intended for a BHC, SLHC and IHC to report noninterest bearing assets, and accordingly is excluded from the calculation of interest income.

Line item 17 Total Average Asset Balances

This item is a shaded cell and is derived, per column, from sum of items 1, 2, 3 through 6, 7, and 8 through 16, as defined in the FR Y-9C, Schedule HC, item 12.

Average Rates Earned

All rates are annualized.

Line item 18 First Lien Residential Mortgages (in domestic offices)

Report the earned average rate of first lien residential mortgages in domestic offices as defined in the FR Y-9C, Schedule HC-C, item 1.c.(2)(a), column B.

DRAFT

Line item 19 Second/Junior Lien Residential Mortgages (in domestic offices)

This item is a shaded cell and is derived, per column, from sum of items 19A and 19B.

Line item 19A Closed-End Junior Liens

Report the earned average rate of second/junior lien residential mortgages in domestic offices as defined in the FR Y-9C, Schedule HC-C, item 1.c.(2)(b), column B.

Line item 19B Home Equity Lines of Credit (HELOCs)

Report the earned average rate of home equity lines of credit in domestic offices as defined in the FR Y-9C, Schedule HC-C, item 1.c.(1), column B.

Line item 20 C&I Loans (excluding small business (scored/delinquency managed)

Report earned average rate of large commercial credits and small business (graded) loans. Note that the definitions for Large Commercial Credits and Small Business (Graded) are aligned with Balance Sheet definitions (e.g., in the current reports, consistent with CCAR 2012 Balance Sheet sub-schedule).

Line item 21 CRE Loans (in domestic offices)

Report the earned average rate of CRE loans in domestic offices as defined in the FR Y-9C, Schedule HC-C, items 1.a.(1), 1.a.(2), 1.d, 1.e.(1), and 1.e.(2), column B.

Line item 22 Credit Cards

Report earned average rate of credit cards as defined in the FR Y-9C, Schedule HC-C, item 6.a, col. A.

Line item 23 Other Consumer

This item is a shaded cell and is derived, per column, from the sum of items 23A through 23C.

Line item 23A Auto Loans

Report earned average rate of auto loans as defined in the FR Y-9C, Schedule HC-C, item 6.c, column A.

Line item 23B Student Loans

Report earned average rate of student loans.

Line item 23C Other, incl. loans backed by securities (non-purpose lending)

Report earned average rate of other loans.

Line item 24 Real Estate Loans (not in domestic offices)

Item 24 is a shaded cell and is derived, per column, from sum of items 24A and 24B. (Also, defined as FR Y-9C, Schedule HC-C, item 1, column A, less above items 18, 19, 21, and FR Y-9C, Schedule HC-C, item 1.b, column B.)

Line item 24A Residential Mortgages (first and second lien)

Report the earned average rate of first and second lien residential mortgages not in domestic offices.

Line item 24B Other

Report the earned average rate of other real estate loans not in domestic offices.

Line item 25 Other Loans and Leases

Report the earned average rate of other loans and leases. Include loans secured by farmland as

DRAFT

defined in Schedule HC-C, FR Y-9C, Schedule HC-C, item 1.b, column B, and other loans not accounted for in the above categories. If total net interest income does not reconcile to FR Y-9C total per PPNR definition using fair value average balances for AFS securities, use "Other" balances (line items 15 and 38) and corresponding rates (line items 27 and 43) to offset the difference.

Line item 26 Nonaccrual Loans

Report the earned average rate of nonaccrual loans. Interest income earned on nonaccrual balances is generally expected to be small.

Line item 27 Securities (AFS and HTM) – Treasuries and Agency Debentures

Report the earned average rate earned on AFS/HTM balances in Treasury and Agency debentures.

Line item 28 Securities (AFS and HTM) – Agency RMBS (both CMOs and pass-throughs)

Report the earned average rate earned on AFS/HTM balances in Agency RMBS.

Line item 29 Securities (AFS and HTM) - Other

Report the earned average rate earned on all other AFS/HTM balances.

Line item 30 Trading Assets

Report the earned average rate of trading assets as defined in the FR Y-9C, Schedule HC-K, item 4.a.

Line item 31 Deposits with Banks and Other

Report the earned average rate of deposits with banks.

Line item 32 Other Interest/Dividend-Bearing Assets

Report the earned average rate of other interest/dividend-bearing asset not accounted for in the above categories.

Line item 33 Total Interest Income

This item is a shaded cell and is derived, per column, from sum of the products of items 1 and 18, 2 and 19, 2A and 19A, 2B and 19B, 3 and 20, 4 and 21, 5 and 22, 6A and 23A, 6B and 23B, 6C and 23C, 7A and 24A, 7B and 24B, 8 and 25, 9 and 26, 10 and 27, 11 and 28, 12 and 29, 13 and 30, 14 and 31, & 15 and 32 annualized.

Average Liability Balances

For the classification of domestic and foreign deposit liabilities, BHCs, SLHCs and IHCs should report based on internal definitions (those deemed to best represent the behavior characteristics of deposits). For all other liabilities, BHCs, SLHCs and IHCs should reference FR Y-9C and other definitions provided in the PPNR Net interest Income sub-schedule when completing this section.

Line item 34 Deposits-Domestic

This item is a shaded cell and is derived, per column, from sum of items 34A through 34E.

A sum of average domestic and foreign deposits should be equal to a sum of average FR Y-9C, Schedule HC, items 13.a.(1), 13.a.(2), 13.b.(1), and 13.b.(2).

Line item 34A Noninterest-bearing Demand

Report balances using internal definitions.

DRAFT

Line item 34B Money Market Accounts

Report balances using internal definitions.

Line item 34C Savings

Report balances using internal definitions.

Line item 34D Negotiable Order of Withdrawal (NOW), Automatic Transfer Service (ATS), and other Transaction Accounts

Report balances using internal definitions.

Line item 34E Time Deposits

Report balances using internal definitions.

Line item 35 Deposits-Foreign

This item is a shaded cell and is derived, per column, from the sum of items 35A and 35B.

A sum of average domestic and foreign deposits should be equal to a sum of average FR Y-9C, Schedule HC, items 13.a.(1), 13.a.(2), 13.b.(1), and 13.b.(2).

Line item 35A Foreign Deposits

Report balances using internal definitions.

Line item 35B Foreign Deposits-Time

Report balances using internal definitions.

Line item 36 Fed Funds, Repos, & Other Short Term Borrowing

This item is a shaded cell and is derived, per column, from the sum of items 36A through 36C.

Line item 36A Fed Funds

Report the average balance of Fed Funds purchased in domestic offices as defined in the FR Y-9C, Schedule HC, item 14.a.

Line item 36B Repos

Report the average balance of Securities sold under agreement to repurchase as defined in the FR Y-9C, Schedule HC, item 14.b.

Line item 36C Other Short Term Borrowing

Report the average balance of liabilities reported as other borrowed money and subordinated notes and debentures (as defined in the FR Y-9C, Schedule HC, items 16 and items 19.a. which the firm would define as short term borrowings).

A sum of line items 36C ("other short term borrowing") and 39 ("other interest bearing liabilities") equals a sum of average BHCK3190, average BHCK4062, and average interest-bearing liabilities reported in BHCK2750; line item 40 ("other liabilities") captures average non-interest bearing liabilities in BHCK2750.

Line item 37 Trading Liabilities

Report the average balance of Trading Liabilities as defined in the FR Y-9C, Schedule HC, item 15.

Line item 38 Subordinated Notes Payable to Unconsolidated Trusts Issuing Trust Preferred

DRAFT

Securities (TruPS) and TruPS Issued by Consolidated Special Purpose Entities

Report the average balance of Preferred Securities (TruPS) and TruPS Issued by Consolidated Special Purpose Entities as defined in the FR Y-9C, Schedule HC, item 19b.

Line item 39 Other Interest-Bearing Liabilities

Report the average balance of liabilities reported as Other Borrowed Money and Subordinated Notes and Debentures as defined in the FR Y-9C, Schedule HC, items 16 and items 19a which are not already reported in line item 35c Other Short Term Borrowing. This includes all long-term debt not included in line item 38 above. A sum of line items 36C (“other short term borrowing”) and 39 (“other interest bearing liabilities”) equals a sum of average BHCK3190, average BHCK4062, and average interest-bearing liabilities reported in BHCK2750; line item 40 (“other liabilities”) captures average non-interest bearing liabilities in BHCK2750.

Line item 40 Other Liabilities

Report the average balance of liabilities reported as Other Liabilities as defined in the FR Y-9C, Schedule HC, item 20. A sum of line items 36C (“other short term borrowing”) and 39 (“other interest bearing liabilities”) equals a sum of average BHCK3190, average BHCK4062, and average interest-bearing liabilities reported in BHCK2750; line item 40 (“other liabilities”) captures average non-interest bearing liabilities in BHCK2750.

Line item 41 Total Average Liability Balances

This item is a shaded cell and is derived, per column, from sum of items 34, 35, 36, and 37 to 40.

Average Liability Rates

All rates are annualized.

Line item 42 Deposits—Domestic

This item is a shaded cell and is derived, per column, from sum of items 42A through 42E.

Line item 42A Noninterest-bearing Demand

This item is a shaded cell; rates are equal to zero by definition.

Line item 42B Money Market Accounts

Report the earned average rate of Money Market Accounts reported in item 34B.

Line item 42C Savings

Report the earned average rate of Savings Accounts reported in item 34C.

Line item 42D Negotiable Order of Withdrawal (NOW), Automatic Transfer Service (ATS), and other Transaction Accounts

Report the earned average rate of Negotiable Order of Withdrawal (NOW), Automatic Transfer Service (ATS), and other Transaction Accounts reported in item 34D.

Line item 42E Time Deposits

Report the earned average rate of Time Deposits reported in item 34E.

Line item 43 Deposits-Foreign

This item is a shaded cell and is derived, per column, from the sum of items 43A and 43B.

Line item 43A Foreign Deposits

DRAFT

Report the earned average rate of Foreign Deposits reported in item 35A.

Line item 43B Foreign Deposits-Time

Report the earned average rate of Foreign Deposits—Time reported in item 35B.

Line item 44 Fed Funds, Repos, & Other Short Term Borrowing

This item is a shaded cell and is derived, per column, from the sum of items 44A through 44C.

Line item 44A Fed Funds

Report the average rate paid for Fed Funds purchased in domestic offices as defined in the FR Y-9C, Schedule HC, item 14a.

Line item 44B Repos

Report the average rate paid for Securities Sold under agreements to repurchase as defined in the FR Y-9C, Schedule HC, item 14b.

Line item 44C Other Short Term Borrowing

Report the average rate paid on liabilities reported as other borrowed money and subordinated notes and debentures as defined in the FR Y-9C, Schedule HC, items 16 and items 19a which the firm defined as short term borrowings.

Line item 45 Trading Liabilities

Report the average rate of Trading Liabilities as defined in the FR Y-9C, Schedule HC, item 15.

Line item 46 Subordinated Notes Payable to Unconsolidated Trusts Issuing Trust Preferred Securities (TruPS) and TruPS Issued by Consolidated Special Purpose Entities

Report the average rate of Preferred Securities (TruPS) and TruPS Issued by Consolidated Special Purpose Entities as defined in the FR Y-9C, Schedule HC, item 19b.

Line item 47 Other Interest-Bearing Liabilities

Report the average rate paid on the liabilities reported as other borrowed money and subordinated notes and debentures as defined in the FR Y-9C, Schedule HC, items 16 and 19a which the firm defined as Other Interest Bearing Liabilities.

Line item 48 Total Interest Expense

This item is a shaded cell and is derived, per column, from sum of the products of items 34A and 42A, 34B and 42B, 34C and 42C, 34D and 42D, 34E and 42E, 35A and 43A, 35B and 43B, 36A and 44A, 36B and 44B, 36C and 44C, 37 and 45, 38 and 46, and 39 and 47, annualized.

Line item 49 Total Net Interest Income

This item is a shaded cell and is derived, per column, from item 33 minus item 48. Amount should equal Sub-schedule 7.a, PPNR Submission Sub-schedule, item 13.

A.7.c—PPNR Metrics

The PPNR Metrics sub-schedule requests information on certain metrics relevant for the assessment of various components of PPNR. Elements in Section C of the PPNR Metrics sub-schedule (line items 53 through 87 and either 884A or 88B&C) are required only for BHCs, SLHCs and IHCs that must complete the Net Interest Income sub-schedule. All other metrics are required of all BHCs, SLHCs and IHCs, subject to applicable thresholds.

DRAFT

Metrics in Section A, "Metrics by Business Segment/Line," correspond to Business Segments/Lines on PPNR Submission sub-schedule. In contrast, Sections B and C are both for firm-wide metrics.

In providing industry market size information, BHCs, SLHCs and IHCs can use third party data and are not required to independently derive these metrics. Any supporting information should be described in detail, including the data source, and corresponding data should be provided in the sub-schedule. A BHC, SLHC or IHC, if relying upon third party data for building projections, should still be cognizant of how their estimates would be appropriate across the range of assumed macro-economic conditions in various scenarios or if some adjustment may be appropriate. BHCs, SLHCs and IHCs should use internal definitions of proprietary trading and clearly describe the covered activities and transactions in methodology narratives.

If a BHC, SLHC or IHC is unable to provide a metric on the PPNR Metrics sub-schedule, it should offer a data series for alternative metrics that are considered by the BHC, SLHC or IHC in projecting the relevant component(s) of PPNR and include in the Supporting Documentation required with the FR-14A Projections a discussion of why the standard metric could not be provided.

Section A. Metrics by Business Segment/Line (unless specified otherwise, all numbers are global).

"Metrics by Business Segment/Line" correspond to Business Segments/Lines on the PPNR Submission Sub-schedule. This means that each metric is reflective of revenues reported on the PPNR Submission sub-schedule for a given business segment/line, unless explicitly stated otherwise.

Retail and Small Business Segment

Domestic

Credit and Charge Cards

Line item 1 Total Open Accounts – End of Period

Report number of total open accounts at the end of period for credit and charge cards.

Line item 2 Credit and Charge Card Purchase Volume

Report credit and charge card purchase volume, net of returns. Exclude cash and balance transfer volumes.

Line item 3 Credit and Charge Card Rewards/Partner Sharing Expense

Report credit card rewards/partner sharing expense for credit and charge cards.

In Footnote 23, list which line item(s) on PPNR Submission Sub-schedule contain(s) the Cards Rewards/Partner Sharing contra-revenues and/or expenses.

Note if this item includes any contra-revenues other than Rewards/Partner Sharing (e.g. Marketing Expense Amortization) in footnote 34.

Mortgages and Home Equity

DRAFT

Line item 4 Average Third-Party Residential Mortgages Serviced

Report the average outstanding principal balance for residential mortgage loans the BHC, SLHC or IHC services for others.

Line item 5 Residential Mortgage Originations Industry Market Size – Volume

Report total volume of domestic mortgages that originated during the quarter. A BHC, SLHC or IHC would provide US industry-wide origination volume (\$millions) for closed-end loans secured by first liens on 1 to 4 family residential properties during a given quarter. This would not include any home equity loans or lines of credit.

Line item 6 Mortgages and Home Equity Sold During the Quarter

Report first and junior lien mortgages and home equity loans sold during the quarter as defined in FR Y-9C, Schedule HC-P, items 3, 1-4 family residential mortgage loans sold during the quarter. This metric need not be limited to Mortgages and Home Equity business line.

Line item 7 Servicing Expenses

Report expenses for servicing first and junior lien mortgages and home equity loans. Include both direct and allocated expenses.

Retail and Small Business Deposits**Line item 8 Total Open Checking and Money Market Accounts – End of Period**

Report only the number of checking and money market accounts that are deposit accounts under FR Y-9C guidance and are consistent with the definitions provided for “Retail and small business banking and lending services” segment and “Retail and small business deposits” business line within this segment in the PPNR instructions.

Line item 9 Debit Card Purchase Transactions

Report number of transactions (not dollar value).

International Retail and Small Business**Line item 10 Credit and Charge Card Revenues**

Provide metrics data for all quarters, but only if international retail and small business segment revenues exceeded 5% of total retail and small business segment and total retail and small business revenue exceeded 5% of total revenues in any of the last four actual quarters requested in the PPNR schedule.

Investment Banking Segment

Only firms that report greater than \$100 million any projected quarter in item 16, Investment Banking, of Schedule A.7.a (PPNR Projections) should report the investment banking metrics below (Lines 11 to 26).

Line item 11 Number of Employees

Report the number of full-time equivalent employees at end of current period as defined in the FR Y-9C, Schedule HI, Memorandum item 5, for investment banking segment.

Line item 12 Compensation – Total

Include both direct and allocated expenses for investment banking segment.

DRAFT

Line item 13 Stock Based Compensation and Cash Variable Pay

Include both direct and allocated expenses for investment banking segment.

Advisory

Line item 14 Deal Volume

Report the global dollar volume of all completed deals for the reporting BHC, SLHC or IHC.

Line item 15 Industry Market Size - Fees

Report global fees earned by all relevant industry participants in this area.

Line item 16 Industry Market Size - Completed Deal Volume

Report the global dollar volume of completed deals for all relevant industry participants.

Line item 17 Backlog

A global backlog should be based on probability weighted fees. The data should be consistent with historical internal reporting, not by market measurement. The last quarter should be the BHC's, SLHC's or IHC's latest backlog estimate. Backlog reporting is not required on a projections basis.

Equity Capital Markets

Line item 18 Deal Volume

Report the global dollar volume of all deals for the reporting BHC, SLHC or IHC.

Line item 19 Industry Market Size - Fees

Report global fees earned by all relevant industry participants in this area.

Line item 20 Industry Market Size - Volume

Report global dollar volume of completed deals for all relevant industry participants.

Debt Capital Markets

Line item 21 Deal Volume

Report the global dollar volume of all deals for the reporting BHC, SLHC or IHC.

Line item 22 Industry Market Size - Fees

Report global fees earned by all relevant industry participants in this area.

Line item 23 Industry Market Size - Volume

Report the global dollar volume of completed deals for all relevant industry participants.

Syndicated Lending

Line item 24 Deal Volume

Report the global dollar volume of all deals for the reporting BHC, SLHC or IHC.

Line item 25 Industry Market Size - Fees

DRAFT

Report global fees earned by all relevant industry participants in this area.

Line item 26 Industry Market Size - Volume

Report the global dollar volume of completed deals for all relevant industry participants.

Sales and Trading Segment

Line item 27 Number of Employees

Report the number of full-time equivalent employees at end of current period as defined in the FR Y-9C, Schedule HI, Memorandum item 5, for sales and trading segment.

Line item 28 Compensation – Total

Include both direct and allocated expenses for sales and trading segment.

Line item 29 Stock Based Compensation and Cash Variable Pay

Include both direct and allocated expenses for sales and trading segment.

Equities

Line item 30 Average Asset Balance

Report average asset balance for the quarter of all mark-to-market assets associated directly with the equity sales and trading businesses.

Fixed Income

Line item 31 Average Asset Balance

Report average asset balance for the quarter of all mark-to-market assets associated directly with the fixed income sales and trading businesses.

Commodities

Line item 32 Average Asset Balance

Report average asset balance for the quarter of all mark-to-market assets associated directly with the commodities sales and trading businesses.

Prime Brokerage

Line item 33 Average Client Balances

Report gross client balances (adding credits, debits, and shorts) that are consistent with and drivers of prime brokerage revenues being reported on the PPNR schedule.

Line item 34 Transaction Volume

Report total dollar volume of all transactions during the quarter.

Investment Management Segment

Asset Management

DRAFT

Line item 35 AUM – Total

This item is a shaded cell and is derived, per column, from the sum of items 35A through 35C.

Line item 35A AUM – Equities

Report total assets under management for which the investment mandate/strategy is primarily equities.

Line item 35B AUM – Fixed Income

Report total assets under management for which the investment mandate/strategy is primarily fixed income.

Line item 35C AUM – Other

Report total assets under management for which the investment mandate/strategy cannot be classified as either Equities or fixed income. For example, include alternative investments, currency products, etc.

Line item 36 Net Inflows/Outflow

Report impact of net inflows/outflows on assets under management.

Wealth Management/Private Banking

Line item 37 Fee Earning Client Assets – Total

This item is a shaded cell and is derived, per column, from the sum of items 37A through 37C.

Line item 37A Fee Earning Client Assets – Equities

Report total Fee Earning Client Assets invested directly or indirectly primarily in equities.

Line item 37B Fee Earning Client Assets – Fixed Income

Report total Fee Earning Client Assets invested directly or indirectly primarily in fixed income.

Line item 37C Fee Earning Client Assets – Other

Report total Fee Earning Client Assets for which the investment cannot be classified as either Equities or fixed income. For example, include some types of alternative investments, currency products, etc.

Line item 38 Net Inflows/Outflow

Report impact of net inflows/outflows on Fee Earning Client Assets.

Line item 39 Number of Financial Advisors

Provide a relevant headcount number (e.g. financial advisors, portfolio managers) to facilitate the assessment of revenue productivity in the Wealth Management/Private Banking business line.

Investment Services Segment

Asset Servicing

Line item 40 Assets under Custody and Administration

Report total assets under custody and administration as of the end of the quarter.

Section B. Firm Wide Metrics: PPNR Projections Sub-schedule

DRAFT

Line item 41 Number of Employees

Report the number of full-time equivalent employees at end of current period as defined in the FR Y-9C, Schedule HI, Memorandum item 5.

Line item 42 Revenues – International

This item is a shaded cell and is derived, per column, from the sum of items 42A through 42D. These items are based on holding company consolidated reporting and not on legal-entity basis.

Line item 42A Revenues - APAC

Provide Asia and Pacific (includes South Asia, Australia, and New Zealand) region breakouts for all quarters, but only if international revenue exceeded 5% of the total revenue in any of the last four actual quarters requested in the PPNR schedule. For specific country assignments, use internal definitions.

Line item 42B Revenues - EMEA

Provide Europe, Middle East, and Africa region breakouts for all quarters, but only if international revenue exceeded 5% of the total revenue in any of the last four actual quarters requested in the PPNR schedule. For specific country assignments, use internal definitions.

Line item 42C Revenues - LatAm

Provide Latin America, including Mexico region breakouts for all quarters, but only if international revenue exceeded 5% of the total revenue in any of the last four actual quarters requested in the PPNR schedule. For specific country assignments, use internal definitions.

Line item 42D Revenues - Canada

Provide Canada region breakouts for all quarters, but only if international revenue exceeded 5% of the total revenue in any of the last four actual quarters requested in the PPNR schedule.

Line item 43 Revenues – Domestic

This item is a shaded cell and is derived, per column, from PPNR Submission Sub-schedule item 27 less item 42. The item will capture all revenues so long as international revenues do not exceed 5% of total revenue in any of the last four actual quarters requested in the PPNR schedule.

Line item 44 Severance Costs

In Footnote 14, list items on PPNR Submission sub-schedule that include this item if any.

Line item 45 Collateral Underlying Operating Leases for Which the Bank is the Lessor

This item is a shaded cell and is derived, per column, from Balance Sheet Sub-schedule item 126.

Refers to the balance sheet carrying amount of any equipment or other asset rented to others under operating leases, net of accumulated depreciation. This item should correspond to the amount provided in the FR Y-9C, Schedule HC-F item 6 (see item 13 in the instructions). The amount included should only reflect collateral rented under operating leases and not include collateral subject to capital/ financing type leases.

Line item 45A Auto

This item is a shaded cell and is derived, per column, from Balance Sheet Sub-schedule item 127.

DRAFT

Line item 45B Other

This item is a shaded cell and is derived, per column, from Balance Sheet Sub-schedule item 128.

Line item 46 OREO Balance

This item is a shaded cell and is derived, per column, from Balance Sheet Sub-schedule item 122, as defined in the FR Y-9C, Schedule HC, item 7. Reporting of OREO items on FR Y-14Q PPNR Metrics is expected to be consistent with reporting of OREO items on FR Y-14A PPNR Metrics sub-schedule which sources the data directly from FR Y-14A Balance Sheet sub-schedule. Thus, reporting of OREO items on FR Y-14Q PPNR Metrics sub-schedule is consistent with reporting of OREO items on FR Y-14A Balance Sheet sub-schedule.

Line item 46A Commercial

This item is a shaded cell and is derived, per column, from Balance Sheet Sub-schedule item 123.

Line item 46B Residential

This item is a shaded cell and is derived, per column, from Balance Sheet Sub-schedule item 124.

Line item 46C Farmland

This item is a shaded cell and is derived, per column, from Balance Sheet Sub-schedule item 125.

Line item 47 Non-Recurring PPNR Items

Report the total income statement impact of all material non-recurring and infrequent items. Examples of such items include gains or losses on sales of business lines, gains or losses on extinguishment of debt, gains or losses on mergers / joint ventures, etc. Break out and explain these excluded items in footnote 32.

Line item 48 Trading Revenue

Report trading revenue as defined in the FR Y-9C, Schedule HI, item 5.c.

Line item 49 Net Gains/(Losses) on Sales of Other Real Estate Owned

Report trading revenue as defined in the FR Y-9C, Schedule HI, item 5.j.

In Footnote 19, list business segments reported on PPNR Submission Sub-schedule that include this item, if any.

Section C. Firm Wide Metrics: Net Interest Income Sub-schedule (Required only for BHCs or IHCs that were required to complete the Net Interest Income Sub-schedule)

Line item 50 Carrying Value of Purchased Credit Impaired (PCI) Loans³⁵

Report carrying value of purchased credit-impaired loans held for investment as defined in the FR Y-9C, Schedule HC-C, memorandum item M.5.b.

Line item 51 Net Accretion of discount on PCI Loans included in interest Revenues³⁶

³⁵ Institutions that have adopted ASU 2016-13 should report the carrying value of Purchased Credit Deteriorated (PCD) loans in item 50.

³⁶ Institutions that have adopted ASU 2016-13 should report the net accretion of discount on loans included in interest revenues in line item 51.

DRAFT

Report the net accretion of discount on PCI loans included in net interest income as included on the PPNR Submission Sub-schedule and Net Interest Income Sub-schedule.

Line item 52 Loans Held for Sale – First Lien Residential Liens in Domestic Offices (Average Balances)

Report average balance of first lien residential loans held for sale as included in the Net Interest Income Sub-schedule.

Line item 53 Average Rate on Loans Held for Sale – First Lien Residential Liens in Domestic Offices

Report average rate paid on first lien residential loans held for sale as included in the Net Interest Income Sub-schedule.

Quarter End Weighted Average Life of Assets

The Weighted Average Life (WAL) should reflect the current position, the impact of new business activity, as well as the impact of behavioral assumptions such as prepayments or defaults, based on the expected remaining lives, inclusive of behavioral assumptions. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in that portfolio, rounded to the nearest monthly term. For revolving products, the WAL should reflect the underlying repayment behavior assumptions assumed by the institution, which would include contractual repayments, any assumed excess payments or prepayments, and defaults. The WAL for the FR Y-14Q disclosures should reflect the spot balance sheet position for each time period. The WAL should be reflective of the timing assumed by the institutions for those assets/liabilities trading portfolios to be held on the balance sheet and not at the individual position level. For the FR Y-14A, given that it covers forecasted time periods, the WAL should be forward-looking which incorporates the changes to the projected WAL, including new business activity. Reference the PPNR Net Interest Income sub-schedule for product definitions.

Line item 54 First Lien Residential Mortgages (in Domestic Offices)

Report the quarter end weighted average life of domestic first lien residential mortgages (as defined in the FR Y-9C, Schedule HC-C, item 1.c.(2)(a), column B).

Line item 55 Closed-End Junior Residential Liens (in Domestic Offices)

Report the quarter end weighted average life of domestic closed-end junior residential liens (as defined in the FR Y-9C, Schedule HC-C, item 1.c.(2)(b), column B).

Line item 56 Home Equity Lines Of Credit (HELOCs)

Report the quarter end weighted average life of domestic home equity lines of credit (as defined in the FR Y-9C, Schedule HC-C, item 1.c.(1), column B).

Line item 57 C&I Loans

Report the quarter end weighted average life of C&I Graded, Small Business (Scored/Delinquency Managed), Corporate Card, and Business Card loans.

Line item 58 CRE Loans (in Domestic Offices)

Report the quarter end weighted average life of domestic CRE loans (as defined in the FR Y-9C, Schedule HC-C, the sum of items 1.a.(1), 1.a.(2), 1.d., 1.e.(1) 1.e.(2)), Column B.

Line item 59 Credit Cards

DRAFT

Report the quarter end weighted average life of credit cards (as defined in the FR Y-9C, Schedule HC-C, item 6.a., column A).

Line item 60 Auto Loans

Report the quarter end weighted average life of auto loans (as defined in the FR Y-9C, Schedule HC-C, item 6.c., column A).

Line item 61 Student Loans

Report the quarter end weighted average life of student loans.

Line item 62 Other, incl. loans backed by securities (non-purpose lending)

Report the quarter end weighted average life of Other Consumer Loans, incl. loans backed by securities (non-purpose lending).

Line item 63 Residential Mortgages (First and Second Lien, Not in Domestic Offices)

Report the quarter end weighted average life of all residential mortgages (first and second lien) not in domestic offices.

Line item 64 Other Real Estate Loans (Not in Domestic Offices)

Report the quarter end weighted average life of other real estate loans not in domestic offices.

Line item 65 Other Loans & Leases

Report the quarter end weighted average life of other loans and leases. Include loans secured by farmland (as defined in the FR Y-9C, Schedule HC-C, item 1.b, column B), and other loans not accounted for in the above categories.

Line item 66 Securities (AFS and HTM) - Treasuries and Agency Debentures

Report the quarter end weighted average life of AFS/HTM balances in Treasury and Agency Debentures (as defined in the FR Y-9C, Schedule HC-B, items 1, 2.a and 2.b, columns A and D). The WAL reporting items (items 69-71) on PPNR Metrics within the Summary Schedule is intended to reflect the weight average remaining life for the reported period. The number is to reflect both the weighted average life of the current positions as well as the impact of assumed new business.

Line item 67 Securities (AFS and HTM) - Agency RMBS (both CMOs and pass-throughs)

Report the quarter end weighted average life of AFS/HTM balances in Agency RMBS (as defined in the FR Y-9C, Schedule HC-B, items 4.a.(1), 4.a.(2), 4.b.(1) and 4.b.(2), columns A and D). The WAL reporting items (items 66 - 68) on PPNR Metrics within the Summary Schedule is intended to reflect the weight average remaining life for the reported period. The number is to reflect both the weighted average life of the current positions as well as the impact of assumed new business.

Line item 68 Securities (AFS and HTM) - Other

Report the quarter end weighted average life of all other AFS/HTM (defined in the FR Y-9C, Schedule HC, as items 2.a and 2.b less PPNR Metrics Sub-schedule line items 66 & 67). The WAL reporting items (items 66-68) on PPNR Metrics within the Summary Schedule is intended to reflect the weight average remaining life for the reported period. The number is to reflect both the weighted average life of the current positions as well as the impact of assumed new business.

Line item 69 Trading Assets

Report the quarter end weighted average life of trading assets (as defined in the FR Y-9C, Schedule HC-K, item 4.a.). For trading assets, WAL should be reflective of the timing assumed by the institutions

DRAFT

for those assets to be held on the balance sheet and not necessarily the duration of the underlying positions.

Line item 70 All Other Earning Assets

Report the quarter end weighted average life of all other interest-bearing assets not accounted for in the above categories.

Quarter End Weighted Average Life of Liabilities

The Weighted Average Life (WAL) should reflect the current position, the impact of new business activity, as well as the impact of behavioral assumptions such as prepayments or defaults, based on the expected remaining lives, inclusive of behavioral assumptions. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in that portfolio, rounded to the nearest monthly term. For revolving products, the WAL should reflect the underlying repayment behavior assumptions assumed by the institution, which would include contractual repayments, any assumed excess payments or prepayments, and defaults. The WAL for the FR Y-14Q disclosures should reflect the spot balance sheet position for each time period. For the FR Y-14A, given that it covers forecasted time periods, the WAL should be forward-looking which incorporates the changes to the projected WAL, including new business activity. Reference PPNR Net Interest Income sub-schedule for product definitions.

Line item 71 Domestic Deposits – Time

Report the quarter end weighted average life for Domestic Time Deposits (using internal definitions).

Line item 72 Foreign Deposits – Time

Report the quarter end weighted average life of Foreign Time Deposits (using internal definitions).

Line item 73 Fed Funds

Report the quarter end weighted average life of Fed Funds purchased in domestic offices (as defined in the FR Y-9C, Schedule HC, item 14.a.).

Line item 74 Repos

Report the quarter end weighted average life of Securities sold under agreement to repurchase (as defined in the FR Y-9C, Schedule HC, item 14.b.).

Line item 75 Other Short Term Borrowing

Report the quarter end weighted average life of liabilities reported as other borrowed money and subordinated notes and debentures (as defined in the FR Y-9C, Schedule HC, items 16. and 19.a., of which the firm would define as short term borrowings).

Line item 76 Trading Liabilities

Report the weighted average life of Trading Liabilities (as defined in the FR Y-9C, Schedule HC, item 15). For trading liabilities, WAL should be reflective of the timing assumed by the institutions for those assets to be held on the balance sheet and not necessarily the duration of the underlying positions.

Line item 77 Subordinated Notes Payable to Unconsolidated Trusts Issuing TruPS and TruPS Issued by Consolidated Special Purpose Entities

Report the quarter end weighted average life of Preferred Securities (TruPS) and TruPS Issued by

DRAFT

Consolidated Special Purpose Entities (as defined in the FR Y-9C, Schedule HC, item 19.b.).

Line item 78 All Other Interest Bearing Liabilities

Report the quarter end weighted average life of all long-term debt not included in line item 80 above.

Average Domestic Deposit Repricing Beta

Domestic deposit repricing is rate movement in an environment where the repricing assumption assumed by each of the major deposit products is not restricted by a cap, floor, or zero. Beta should be reported as a balance-weighted average of the actual utilized betas of the line items that contribute to the roll up point requested. The as of date of the balance weights must be equal to the reporting date for all applicable scenarios.

For the balance-weighted average beta, each deposit category should be reported using a blend of brokered and retail deposits. Beta refers to the average repricing response rate the firm projects for each of the deposit products relative to movements in interest rates and might be different based on the scenario.

The betas for line items 79 through 82 should be reported in basis points (bp) and reflect movement in the yield curve, either up or down in relationship to an assumed 100 bps movement and specific to each scenario, if applicable. For beta-related line items 79 to 84 on the PPNR Metrics template, a negative number can be reported in the downward rate movements. However, a negative would be indicating that the firm is projecting an “increase” in the beta when rates movements are down.

Line item 79 Money Market Accounts

Report (in decimal form basis points) the balance-weighted average beta of domestic money market accounts (using internal definitions for this product).

Line item 80 Savings

Report (in basis points) the balance-weighted average beta of domestic savings accounts (using internal definitions for this product).

Line item 81 NOW, ATS, and other Transaction Accounts

Report (in basis points) the balance-weighted average beta of Negotiable Order of Withdrawal (NOW), Automatic Transfer Service (ATS), and other transaction accounts (using internal definitions for these products).

Line item 82 Time Deposits

Report (in basis points) the balance-weighted average beta of time deposits (using internal definitions for this product).

Average Foreign Deposit Repricing Beta

Foreign deposit repricing is rate movement in an environment where the repricing assumption assumed by each of the major deposit products is not restricted by a cap, floor, or zero. Beta should be reported as a balance-weighted average of the actual utilized betas of the line items that contribute to the roll up point requested. The as of date of the balance weights must be equal to the reporting date for all applicable scenarios.

For the balance-weighted average beta, each deposit category should be reported using a blend of brokered and retail deposits. Beta refers to the average repricing response rate the firm projects for

DRAFT

each of the deposit products relative to movements in interest rates and might be different based on the scenario.

The beta ratios for line items 83 through 85C should be reported in basis points (bp) movement in the yield curve, either up or down in relationship to an assumed 100 bps movement and specific to each scenario, if applicable.

Line item 83 Foreign Deposits

Report (in basis points) the balance-weighted average beta of foreign deposits (using internal definitions for this product).

Line item 84 Foreign Deposits-Time

Report (in basis points) the balance-weighted average beta of foreign time deposits (using internal definitions for this product). It is appropriate to report this item as a “balance-weighted average beta of foreign time deposits.

Line item 85 New Domestic Business Pricing for Time Deposits

New business pricing for time deposits refers to the anticipated average rate on newly issued time deposits, including renewals. Given that time deposits have a stated maturity, all time deposits issued for that time period are considered new business. The sub-schedule is requesting re-pricing beta under normal rate scenarios for both an upward and downward rate movement.

Line item 85A Curve (if multiple terms assumed)

Report the primary reference curve used by the firm for pricing time deposits.

If more than one curve for the pricing of time deposits is used, the curve used to price the majority of the time deposits should be noted on the schedule and additional pricing information should be provided in the supplementary information. If the institution only assumes a single maturity term for new issuance, then the institution should provide the relative index (line item 85B) and spread used to estimate new business pricing in lieu of the curve (line item 85C).

The term “curve” refers to the reference rate used to price time deposits. Given that the pricing of time deposits is dependent on the term, the institution should provide the overall curve used to price time deposits.

Line item 85B Index Rate (if single term assumed)

Report the index (e.g., 30 day LIBOR) used to price time deposits when a single maturity term for new issuances is assumed. The index should be the one to which the beta in line item 82 is applied.

Line item 85C Spread (Relative to the Index Rate)

Report the weighted average spread used to price time deposits above the index rate when a single maturity term for new issuances is assumed.

DRAFT

Schedule B—Scenario

These instructions provide guidance for reporting the variables used in the firm-defined macroeconomic scenarios underlying the projections of losses, revenue, and capital. These scenarios include the supervisory baseline scenario, supervisory severely adverse, BHC baseline scenario, and BHC stress scenario, as well as, any additional scenarios generated by the firm or supplied by the Federal Reserve. (Additional Scenario #1; Additional Scenario #2; etc.)

The template consists of three sub-schedules that each BHC or IHC must complete. Additional sub-schedules are provided if the BHC or IHC generated additional variables for the supervisory scenarios or reported additional scenarios beyond the BHC baseline and BHC stress scenarios. The sub-schedules in the template are:

Scenario Variable Definitions: This sub-schedule should be used to list and define the variables included in the BHC or IHC baseline and BHC or IHC stress scenarios, as well as, any additional BHC or IHC scenarios reported.

- The sub-schedule allows for the supervisory baseline scenario, supervisory severely adverse scenario, BHC baseline scenario, and BHC stress scenario, as well as, space for an additional scenario. The sections for the BHC baseline and BHC stress scenarios must be completed. If one or more additional scenarios are provided, then reference the technical instructions.
- For each scenario, variable names and definitions must be provided.
- Variable definitions should include a description of the variable and the denomination and/or frequency of the variable (e.g., "Billions of 2005 dollars" or "in percent, average of monthly values").
- The forecasts and historical data for all the scenario variables are constructed on the same basis. Thus, if a variable is, over history, constructed as an average, its forecast should be interpreted as an average as well. For reference, below are the definitions (i.e. period-average or period-end) of the financial market variables in the scenario:
 - U.S. 3-month Treasury yield: Quarterly average of 3-month Treasury bill secondary market rate discount basis.
 - U.S. 10-year Treasury yield: Quarterly average of the yield on 10-year U.S. Treasury bonds.
 - U.S. BBB corporate yield: Quarterly average of the yield on 10-year BBB-rated corporate bonds.
 - U.S. mortgage rate: Quarterly average of weekly series of Freddie Mac data.
 - U.S. Dow Jones Total Stock Market Index: End of quarter value, Dow Jones.
 - U.S. Market Volatility Index (VIX): Chicago Board Options Exchange converted to quarterly by using the maximum value in any quarter.
- Any number of variables may be reported. The same variables do not necessarily have to be included in each scenario.
- Firms should include all economic and financial market variables that were important in projecting results, including those that affect only a subset of portfolios or positions. For example, if asset prices had a meaningful impact, the assumed level of the equity market and interest rates should be included, or if bankruptcy filings affect credit card loss estimates, then the assumed levels of these should be reported.

DRAFT

- For additional variables generated for the supervisory severely adverse scenario, BHCs and IHCs should set the paths to be as consistent as possible with the paths of the variables already specified in the scenario.
- Firms should also include any variables capturing regional or local economic or asset value conditions, such as regional unemployment rates or housing prices, if these were used in the projections.
- Firms should include historical data, as well as projections, for any macroeconomic, regional, local, or financial market variables that are not generally available. Historical data for these variables can be included in a separate sub-schedule.

B.1—Supervisory Baseline Scenario

This sub-schedule should be used to report the values of any additional variables generated for the supervisory baseline scenario.

B.3—Supervisory Severely Adverse Scenario

This sub-schedule should be used to report the values of any additional variables generated for the supervisory severely adverse scenario.

B.4—BHC Baseline Scenario

This sub-schedule should be used to report the values of the variables included in the BHC baseline scenario.

B.5—BHC Adverse Scenario

This sub-schedule should be used to report the values of the variables included in the BHC stress scenario.

B.6+ —Additional Scenario #1/#2/etc.

These sub-schedules should be used to report the values of the variables included in any additional scenarios.

All Scenarios: The following applies to all of the Scenario tabs:

- The variables should be the same (and have the same names) as the variables listed in the corresponding sections of the *Scenario Variable Definitions* Sub-schedule.
- List quarterly values for the variables starting with the last realized value through the end of the forecast horizon.
- If a BHC or IHC needs to infer a monthly (instead of quarterly) progression of variables, it should smooth or prorate the variables, rather than holding the quarterly value constant over the quarter months.
- Please enter all variables as levels rather than as changes or growth rates (for instance, the dollar value of real GDP rather than the GDP growth rate).

DRAFT

Schedule C—Regulatory Capital Instruments

General guidance

The Regulatory Capital Instruments annual (FR Y-14A) schedule collects actual (historical) data and projections over the nine quarter horizon of BHCs' or IHCs' balances of the funded instruments that are included in regulatory capital. The schedule collects data on the historical balances and projected balances of funded regulatory capital instruments by instrument type, in addition to projections for issuances and redemptions that contribute to changes in balances under the BHC baseline scenario.

A BHC must indicate whether the submission of the FR Y-14A Regulatory Capital Instruments schedule relates to the original submission of the BHC's planned capital actions ("Original" submission), the optional adjustment to planned capital actions prior to the finalization of the CCAR results ("Adjusted" submission), or ~~the notification a request to make additional capital of distributions in excess of planned distributions as required under the capital plan rule above those included in the BHC's capital plan between CCAR exercises~~ ("Incremental" submission). The original submission is due April 5 of each calendar year. The adjusted submission would be submitted if the firm chooses to adjust its planned capital actions based on the preliminary results of CCAR. The incremental submission must be submitted within 15 days of distributions in excess of planned distributions as required under the capital plan rule.

The Board will notify companies of the date on which it expects companies to submit planned capital actions at least 14 calendar days prior to the expected deadline for submitted planned capital actions. ~~Incremental capital actions would be submitted at the time the firm wishes to seek approval for additional capital distributions (see 12 CFR 225.8(g)) or notify the Federal Reserve of its intention to make additional capital distributions under the de minimis exception of the capital plan rule (see 12 CFR 225.8(g)(2)).~~

This schedule collects the total balances of capital instruments and planned redemptions and issuances at an aggregate instrument-type level (e.g., common stock, non-cumulative perpetual preferred, subordinated debt, etc.).

The instructions for the sub-schedule should be read in conjunction with the regulatory capital guidelines issued by the Federal Reserve, the FR Y-9C report and instructions and the regulatory capital rule (see generally 12 CFR 217).

BHCs and IHCs must report information on both a notional basis and on the basis of the dollar amount included in regulatory capital. For "Notional Amount" report the total notional amount of each instrument. BHCs and IHCs must provide the "Notional Amount" regardless of whether there is an associated amount recognized in regulatory capital. For example, 100% of subordinated debt nearing maturity with limited or no recognition in regulatory capital should be included. For "Amount Recognized in Regulatory Capital" report the portion of the notional amount that is recognized in regulatory capital.

BHCs and IHCs should use the "Comments" field to provide identification of individual instruments that have changed in value. Respondents should also include any other characteristics that impact the investment value. BHCs and IHCs must provide a page reference in their Capital Plan in which the stated activities are captured in the "Page Reference in the Capital Plan" fields for field for any line item with "Comments"; this information is not required for the capital balance sections of the schedule. If page references are not available for the entries in the 'Quarterly Activity - Other than Issuances,

DRAFT

Repurchases, or Redemptions' section, then the BHC or IHC is required to provide detailed comments explaining the entry in the "Comments" field. All BHCs and IHCs must report quarter ending balances under the "Actual As of Date" and projected balances under Projection Quarters PQ1, PQ2, PQ3, PQ4, PQ5, PQ6, PQ7, PQ8, and PQ9 for both the "Notional Amount" and the "Amount recognized in regulatory capital".

For any instrument type the BHC or IHC has not issued and does not project to issue, BHCs or IHCs must leave the field blank.

For both the "Notional amount" and "Amount recognized in regulatory capital" within the "Revised regulatory capital treatment section," BHCs and IHCs must provide the actual and projected aggregate dollar amounts (\$Millions) for each line item under the regulatory capital rule. Submissions must reflect the necessary transition provisions for non-qualifying capital instruments with their quarter ending actual balances reported.

For "Quarterly Redemption/Repurchase Activity," report the actual and projected aggregate dollar amount (\$Millions) of planned redemptions and repurchases to be conducted in each quarter for each type of capital instrument. All redemptions and repurchases must be reported as negative values. "Quarterly Redemption/Repurchase Activity" must include increases and decreases in additional paid in capital (APIC) attributable to the amortization of employee stock compensation and any changes in APIC, treasury or common stock as a result of the actual issuance of common stock for the employee stock compensation.

For "Quarterly Issuance Activity," report the actual and projected aggregate dollar amount (\$Millions) of planned issuances to be conducted in each quarter for each instrument type. "Quarterly Issuance Activity" must include increases and decreases in additional paid in capital (APIC) attributable to the amortization of employee stock compensation and any changes in APIC, treasury or common stock as a result of the actual issuance of common stock for the employee stock compensation.

Conversion of preferred stock to common stock should be reported as a redemption of preferred stock and an issuance of common stock in the same quarter.

For "Quarterly Activity – Other than Issuances, Repurchases, or Redemptions," report the actual and projected aggregate dollar amount (\$Millions) of planned changes in regulatory capital instruments that are not the direct result of issuances, repurchases, or redemptions, including but not limited to: (1) Maturities of capital instruments; and (2) Equity contributions from a parent that do not involve the issuance of common stock.

For "Capital Balances," report the actual aggregate balances (\$Millions) of each type of capital instrument for the as-of quarter end date, reflecting the impact of planned capital actions. "Capital Balances" "Notional Amount" the actual must be completed, even if the instrument is not recognized in regulatory capital. Projection quarters are calculated based on the activity reported in the "Quarterly Redemption/Repurchase Activity", "Quarterly Issuance Activity", and "Quarterly Activity – Other than issuances and repurchases" and the reported "Actual".

DRAFT

Quarterly Redemption/Repurchase Activity

Line Item 1 Common Stock (CS) (Revised regulatory capital rule treatment – Common Equity Tier 1)

(1) "Common Stock" as defined in the FR Y-9C, Schedule HC, line item 24, provided it meets the criteria for common equity tier 1 capital based on the regulatory capital rules of the Federal Reserve. Include capital instruments issued by mutual banking organizations that meet the criteria for common equity tier 1 capital;

(2) PLUS: "Surplus" as defined in the FR Y-9C, Schedule HC, line item 25;

(3) PLUS: "Other equity capital components" as defined in the FR Y-9C, Schedule HC, line item 26(c) (only warrants in (2) surplus should be subtracted); and

(4) LESS: "Issuances associated with the U.S. Department of Treasury Capital Purchase Program: Warrants to Purchase Common Stock" as defined in the FR Y-9C, Schedule HC-M, line item 24(b).

Line 1 should exclude amounts reported in line 2 as described below.

Line Item 2 Common Stock (CS) - Employee Stock Compensation (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report the carrying amount of common stock as defined in the FR Y-9C, Schedule HC, line item 24 issued as part of an employee stock ownership plan (ESOP) and included in equity capital on the balance sheet. Include increases and decreases in additional paid in capital (APIC) attributable to the amortization of employee stock compensation and any changes in APIC, treasury or common stock as a result of the actual issuance of common stock for employee stock for employee stock compensation.

Line Item 3 CS Warrants (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report the carrying amount of warrants to issue common stock as defined in the FR Y-9C, Schedule HC, line item 24 and included in equity capital on the balance sheet.

Line Item 4 CS USG Investment (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report the carrying amount of warrants issued to the U.S. Department of Treasury to purchase common stock as defined in the FR Y-9C, Schedule HC, line item 24 of the reporting institution that is included in equity capital on the balance sheet included in the FR Y-9C, Schedule HC-M, line item 24(b).

Line Item 5 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report capital instruments issued by a fully consolidated subsidiary of the reporting institution to a third party investor that qualify for inclusion in common equity tier 1 capital as defined in the FR Y-9C, Schedule HC-R, Part I, line item 4. To qualify for inclusion in common equity tier 1 capital, the capital instruments must be issued by a depository institution or a foreign bank that is a consolidated subsidiary of a banking organization.

Line Item 6 Other Common Equity Tier 1 Instruments (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report all other Common Equity Tier 1 instruments issued that are not included in the FR Y-9C, Schedule HC-R, Part I, line items 1, 2, 4 and 5.

DRAFT

Line Item 7 Non-Cumulative Perpetual Preferred (NCP) (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of noncumulative perpetual preferred stock and related surplus included in the FR Y-9C, Schedule HC, line item 23, and any other capital instrument and related surplus that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 8 NCP Convertible (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of NCP Convertible securities and related surplus included in the FR Y-9C, Schedule HC, line item 23, that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 9 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of Mandatory Convertible Preferred (MCP) securities and related surplus included in the FR Y-9C, Schedule HC, line item 23, that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 10 MCP USG Preferred (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of mandatory convertible preferred securities issued to the U.S. Department of Treasury by bank and intermediate holding companies that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve included in the FR Y-9C, Schedule HC, line item 3, and Schedule HC-M, line item 24(a).

Item 11 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of tier 1 minority interest not included in common equity tier 1 capital that is includable at the consolidated level as defined in the FR Y-9C, Schedule HC-R, Part I, line item 22. For tier 1 minority interest, there is no requirement that the subsidiary be a depository institution or a foreign bank. However, the instrument that gives rise to additional tier 1 minority interest must meet all the criteria for additional tier 1 capital instrument.

Line Item 12 Other Additional Tier 1 Instruments (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of all other capital instruments, other than those included in line items 7 through 11 that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 13 Cumulative Perpetual Preferred (CPP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of Cumulative Perpetual Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 14 CPP TARP Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

DRAFT

Report the amount of CPP TARP Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 15 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of Mandatory Convertible Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 16 MCP USG Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of MCP USG Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 17 Cumulative Dated Preferred (TRUPS) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of Cumulative Dated Preferred (TRUPS) securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 18 USG Preferred TRUPS (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of USG Preferred (TRUPS) securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 19 Other Non-qualifying Instruments in Tier 1 (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of all other capital instruments other than those include in line items 14 through 18 that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 20 Subordinated Debt (Revised regulatory capital rule treatment – Tier 2)

Report subordinated debt instruments that satisfy all eligibility criteria under the regulatory capital rules of the Federal Reserve and related surplus included in the FR Y-9C, Schedule HC-R, Part I, line item 27. Include instruments that were (i) issued under the Small Business Jobs Act of 2010, or, prior to October 4, 2010, under the Emergency Economic Stabilization Act of 2008 and (ii) were included in the tier 2 capital nonqualifying capital instruments (e.g., TruPS and cumulative perpetual preferred) under the Federal Reserve’s general risk-based capital rules.

Line Item 21 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Tier 2)

DRAFT

Report the amount of total capital minority interest not included in tier 1 capital, as defined in the FR Y-9C, Schedule HC-R, Part I, line item 29.

Line Item 22 Other Tier 2 Instruments (Revised regulatory capital rule treatment – Tier 2)

Report all other capital instruments, other than those included in line items 20 and 21, that satisfy all eligibility criteria under the regulatory capital rules of the Federal Reserve and related surplus included in the FR Y-9C, Schedule HC-R, Part I, line item 27.

In addition, report tier 2 capital non-qualifying capital instruments (e.g., TruPS and cumulative perpetual preferred) that have been phased-out of tier 1 capital in the FR Y-9C, Schedule HC-R, Part I, line item 21.

For items 23 through 29, holding companies may include in regulatory capital debt or equity instruments issued prior to September 12, 2010, that do not meet the criteria for additional tier 1 or tier 2 capital instruments in 12 CFR 217.20 of the regulatory capital rules but that were included in tier 1 or tier 2 capital respectively as of September 12, 2010 (non-qualifying capital instruments issued prior to September 12, 2010) up to the percentage of the outstanding principal amount of such non-qualifying capital instruments as of January 1, 2014, in the FR Y-9C, Schedule HC-R, line item 21.

Line Item 23 Cumulative Perpetual Preferred (CPP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 24 CPP TARP Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of CPP TARP Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 25 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Mandatory Convertible Preferred (MCP) instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 26 MCP USG Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 27 Cumulative Dated Preferred (TRUPS) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

DRAFT

Report the amount of Cumulative Dated Preferred (TRUPS) instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 28 USG Preferred TRUPS (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 29 Other Non-qualifying Instruments in Tier 2 (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of all capital instruments other than the ones included in line items 23 through 28 that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Quarterly Issuance Activity

Line Item 30 Common Stock (CS) (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report (1) "Common Stock" as defined in the FR Y-9C, Schedule HC, line item 24, provided it meets the criteria for common equity tier 1 capital based on the regulatory capital rules of the Federal Reserve. Include capital instruments issued by mutual banking organizations that meet the criteria for common equity tier 1 capital;

(2) PLUS: "Surplus" as defined in the FR Y-9C, Schedule HC, line item 25;

(3) PLUS: "Other equity capital components" as defined in the FR Y-9C, Schedule HC, line item 26(c) (only warrants in (2) surplus should be subtracted); and

(4) LESS: "Issuances associated with the U.S. Department of Treasury Capital Purchase Program: Warrants to Purchase Common Stock" as defined in the FR Y-9C, Schedule HC-M, line item 24(b).

Line 30 should exclude amounts reported in line 31 as described below.

Line Item 31 Common Stock (CS) - Employee Stock Compensation (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report the carrying amount of common stock as defined in the FR Y-9C, Schedule HC, line item 24 issued as part of an employee stock ownership plan (ESOP) and included in equity capital on the balance sheet. Include increases and decreases in additional paid in capital (APIC) attributable to the amortization of employee stock compensation and any changes in APIC, treasury or common stock as a result of the actual issuance of common stock for employee stock for employee stock compensation.

Line Item 32 CS Warrants (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report the carrying amount of warrants to issue common stock as defined in the FR Y-9C, Schedule HC, line item 24 and included in equity capital on the balance sheet.

Line Item 33 CS USG Investment (Revised regulatory capital rule treatment – Common Equity Tier 1)

DRAFT

Report the carrying amount of warrants issued to the U.S. Department of Treasury to purchase common stock as defined in the FR Y-9C, Schedule HC, line item 24 of the reporting institution that is included in equity capital on the balance sheet included in the FR Y-9C, Schedule HC-M, line item 24(b).

Line Item 34 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report capital instruments issued by a fully consolidated subsidiary of the reporting institution to a third party investor that qualify for inclusion in common equity tier 1 capital as defined in the FR Y-9C, Schedule HC-R, Part I, line item 4. To qualify for inclusion in common equity tier 1 capital, the capital instruments must be issued by a depository institution or a foreign bank that is a consolidated subsidiary of a banking organization.

Line Item 35 Other Common Equity Tier 1 Instruments (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report as defined in the regulatory capital rule (July 2013).

Line Item 36 Non-Cumulative Perpetual Preferred (NCP) (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of noncumulative perpetual preferred stock and related surplus included in the FR Y-9C, Schedule HC, line item 23, and any other capital instrument and related surplus that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 37 NCP Convertible (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of NCP Convertible securities and related surplus included in the FR Y-9C, Schedule HC, line item 23, that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 38 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of Mandatory Convertible Preferred (MCP) securities and related surplus included in the FR Y-9C, Schedule HC, line item 23, that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 39 MCP USG Preferred (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of mandatory convertible preferred securities issued to the U.S. Department of Treasury by bank and intermediate holding companies that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve included in the FR Y-9C, Schedule HC, line item 3 and Schedule HC-M, line item 24(a).

Line Item 40 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of tier 1 minority interest not included in common equity tier 1 capital that is includable at the consolidated level as defined in the FR Y-9C, Schedule HC-R, Part I, line item 22. For tier 1 minority interest, there is no requirement that the subsidiary be a depository institution or a foreign bank. However, the instrument that gives rise to additional tier 1 minority interest must meet all the criteria for additional tier 1 capital instrument.

Line Item 41 Other Additional Tier 1 Instruments (Revised regulatory capital rule treatment – Additional Tier 1)

DRAFT

Report the amount of all other capital instruments, other than those included in line items 36 through 40 that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 42 Cumulative Perpetual Preferred (CPP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of Cumulative Perpetual Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 43 CPP TARP Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of CPP TARP Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 44 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of Mandatory Convertible Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 45 MCP USG Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of MCP USG Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 46 Cumulative Dated Preferred (TRUPS) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of Cumulative Dated Preferred (TRUPS) securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 47 USG Preferred TRUPS (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of USG Preferred (TRUPS) securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 48 Other Non-qualifying Instruments in Tier 1 (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of all other capital instruments other than those include in line items 42 through 47 that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 49 Subordinated Debt (Revised regulatory capital rule treatment – Tier 2)

DRAFT

Report subordinated debt instruments that satisfy all eligibility criteria under the regulatory capital rules of the Federal Reserve and related surplus included in the FR Y-9C, Schedule HC-R, Part I, line item 27. Include instruments that were (i) issued under the Small Business Jobs Act of 2010, or, prior to October 4, 2010, under the Emergency Economic Stabilization Act of 2008 and (ii) were included in the tier 2 capital nonqualifying capital instruments (e.g., TruPS and cumulative perpetual preferred) under the Federal Reserve's general risk-based capital rules.

Line Item 50 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Tier 2)

Report the amount of total capital minority interest not included in tier 1 capital, as defined in the FR Y-9C, Schedule HC-R, Part I, line item 29.

Line Item 51 Other Tier 2 Instruments (Revised regulatory capital rule treatment – Tier 2)

Report all other capital instruments, other than those included in line items 49 and 50, that satisfy all eligibility criteria under the regulatory capital rules of the Federal Reserve and related surplus included in the FR Y-9C, Schedule HC-R, Part I, line item 27. In addition, report tier 2 capital non-qualifying capital instruments (e.g., TruPS and cumulative perpetual preferred) that have been phased-out of tier 1 capital in the FR Y-9C, Schedule HC-R, Part I, line item 21.

For items 52 through 58, holding companies may include in regulatory capital debt or equity instruments issued prior to September 12, 2010, that do not meet the criteria for additional tier 1 or tier 2 capital instruments in 12 CFR 217.20 of the regulatory capital rules but that were included in tier 1 or tier 2 capital respectively as of September 12, 2010 (non-qualifying capital instruments issued prior to September 12, 2010) up to the percentage of the outstanding principal amount of such non-qualifying capital instruments as of January 1, 2014, in Schedule HC-R, item 21.

Line Item 52 Cumulative Perpetual Preferred (CPP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 53 CPP TARP Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of CPP TARP Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 54 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Mandatory Convertible Preferred (MCP) instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 55 MCP USG Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

DRAFT

Report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 56 Cumulative Dated Preferred (TRUPS) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Cumulative Dated Preferred (TRUPS) instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 57 USG Preferred TRUPS (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 58 Other Non-qualifying Instruments in Tier 2 (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of all capital instruments other than the ones included in line items 52 through 57 that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Quarterly Activity - Other than issuances or repurchases

Line Item 59 Common Stock (CS) (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report (1) "Common Stock" as defined in the FR Y-9C, Schedule HC, line item 24, provided it meets the criteria for common equity tier 1 capital based on the regulatory capital rules of the Federal Reserve. Include capital instruments issued by mutual banking organizations that meet the criteria for common equity tier 1 capital;

(2) PLUS: "Surplus" as defined in the FR Y-9C, Schedule HC, line item 25;

(3) PLUS: "Other equity capital components" as defined in the FR Y-9C, Schedule HC, line item 26(c) (only warrants in (2) surplus should be subtracted); and

(4) LESS: "Issuances associated with the U.S. Department of Treasury Capital Purchase Program: Warrants to Purchase Common Stock" as defined in the FR Y-9C, Schedule HC-M, line item 24(b).

Line 59 should exclude amounts reported in line 60 as described below.

Line Item 60 Common Stock (CS) - Employee Stock Compensation (Revised regulatory capital rule treatment – CET1)

Report the carrying amount of common stock as defined in the FR Y-9C, Schedule HC, line item 24 issued as part of an employee stock ownership plan (ESOP) and included in equity capital on the balance sheet. Include increases and decreases in additional paid in capital (APIC) attributable to the amortization of employee stock compensation and any changes in APIC, treasury or common stock as a result of the actual issuance of common stock employee stock compensation.

Line Item 61 CS Warrants (Revised regulatory capital rule treatment – Common Equity Tier 1)

DRAFT

Report the carrying amount of warrants to issue common stock as defined in the FR Y-9C, Schedule HC, line item 24 and included in equity capital on the balance sheet.

Line Item 62 CS USG Investment (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report the carrying amount of warrants issued to the U.S. Department of Treasury to purchase common stock as defined in the FR Y-9C, Schedule HC, line item 24 of the reporting institution that is included in equity capital on the balance sheet included in the FR Y-9C, Schedule HC-M, line item 24(b)

Line Item 63 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report capital instruments issued by a fully consolidated subsidiary of the reporting institution to a third party investor that qualify for inclusion in common equity tier 1 capital as defined in the FR Y-9C, Schedule HC-R, Part I, line item 4. To qualify for inclusion in common equity tier 1 capital, the capital instruments must be issued by a depository institution or a foreign bank that is a consolidated subsidiary of a banking organization.

Line Item 64 Other Common Equity Tier 1 Instruments (Revised regulatory capital rule treatment – Common Equity Tier 1)

Report as defined in the regulatory capital rule .

Line Item 65 Non-Cumulative Perpetual Preferred (NCP) (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of noncumulative perpetual preferred stock and related surplus included in the FR Y-9C, Schedule HC, line item 23, and any other capital instrument and related surplus that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 66 NCP Convertible (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of NCP Convertible securities and related surplus included in the FR Y-9C, Schedule HC, line item 23, that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 67 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of Mandatory Convertible Preferred (MCP) securities and related surplus included in the FR Y-9C, Schedule HC, line item 23, that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 68 MCP USG Preferred (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of mandatory convertible preferred securities issued to the U.S. Department of Treasury by bank and intermediate holding companies that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve included in the FR Y-9C, Schedule HC, line item 3 and Schedule HC-M, line item 24(a).

Line Item 69 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of tier 1 minority interest not included in common equity tier 1 capital that is includable at the consolidated level as defined in the FR Y-9C, Schedule HC-R, Part I, line item 22. For

DRAFT

tier 1 minority interest, there is no requirement that the subsidiary be a depository institution or a foreign bank. However, the instrument that gives rise to additional tier 1 minority interest must meet all the criteria for additional tier 1 capital instrument.

Line Item 70 Other Additional Tier 1 Instruments (Revised regulatory capital rule treatment – Additional Tier 1)

Report the amount of all other capital instruments, other than those included in line items 65 through 69 that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

Line Item 71 Cumulative Perpetual Preferred (CPP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of Cumulative Perpetual Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 72 CPP TARP Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of CPP TARP Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 73 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of Mandatory Convertible Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 74 MCP USG Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of MCP USG Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 75 Cumulative Dated Preferred (TRUPS) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of Cumulative Dated Preferred (TRUPS) securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 76 USG Preferred TRUPS (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of USG Preferred (TRUPS) securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

DRAFT

Line Item 77 Other Non-qualifying Instruments in Tier 1 (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

Report the amount of all other capital instruments other than those included in line items 71 through 76 that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 78 Subordinated Debt (Revised regulatory capital rule treatment – Tier 2)

Report subordinated debt instruments that satisfy all eligibility criteria under the regulatory capital rules of the Federal Reserve and related surplus included in the FR Y-9C, Schedule HC-R, Part I, line item 27. Include instruments that were (i) issued under the Small Business Jobs Act of 2010, or, prior to October 4, 2010, under the Emergency Economic Stabilization Act of 2008 and (ii) were included in the tier 2 capital nonqualifying capital instruments (e.g., TruPS and cumulative perpetual preferred) under the Federal Reserve's general risk-based capital rules.

Line Item 79 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Tier 2)

Report the amount of total capital minority interest not included in tier 1 capital, as defined in the FR Y-9C, Schedule HC-R, Part I, line item 29.

Line Item 80 Other Tier 2 Instruments (Revised regulatory capital rule treatment – Tier 2)

Report all other capital instruments, other than those included in line items 78 and 79, that satisfy all eligibility criteria under the regulatory capital rules of the Federal Reserve and related surplus included in the FR Y-9C, Schedule HC-R, Part I, line item 27.

In addition, report tier 2 capital non-qualifying capital instruments (e.g., TruPS and cumulative perpetual preferred) that have been phased-out of tier 1 capital in the FR Y-9C, Schedule HC-R, Part I, line item 21.

For items 81 through 87, holding companies may include in regulatory capital debt or equity instruments issued prior to September 12, 2010, that do not meet the criteria for additional tier 1 or tier 2 capital instruments in 12 CFR 217.20 of the regulatory capital rules but that were included in tier 1 or tier 2 capital respectively as of September 12, 2010 (non-qualifying capital instruments issued prior to September 12, 2010) up to the percentage of the outstanding principal amount of such non-qualifying capital instruments as of January 1, 2014, in Schedule HC-R, item 21.

Line Item 81 Cumulative Perpetual Preferred (CPP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 82 CPP TARP Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of CPP TARP Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

DRAFT

Line Item 83 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Mandatory Convertible Preferred (MCP) instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 84 MCP USG Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 85 Cumulative Dated Preferred (TRUPS) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Cumulative Dated Preferred (TRUPS) instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 86 USG Preferred TRUPS (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Line Item 87 Other Non-qualifying Instruments in Tier 2 (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

Report the amount of all capital instruments other than the ones included in items 81 through 86 that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

Capital Balances

Line Item 88 Common Stock (CS) (Revised regulatory capital rule treatment – Common Equity Tier 1)

For the actual as-of date, report

(1) "Common Stock" as defined in the FR Y-9C, Schedule HC, line item 24, provided it meets the criteria for common equity tier 1 capital based on the regulatory capital rules of the Federal Reserve. Include capital instruments issued by mutual banking organizations that meet the criteria for common equity tier 1 capital;

(2) PLUS: "Surplus" as defined in the FR Y-9C, Schedule HC, line item 25;

(3) PLUS "Other equity capital components" as defined in the FR Y-9C, Schedule HC, line item 26(c)(only warrants in (2) surplus should be subtracted); and

(4) LESS: "Issuances associated with the U.S. Department of Treasury Capital Purchase Program: Warrants to Purchase Common Stock" as defined in the FR Y-9C, Schedule HC-M, line item 24(b).

Line 88 should exclude amounts reported in line 89 as described below.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 1, 2, 30, 31, 59, 60 and actual as-of date item 88. For projection periods PQ2 through PQ9, the item is calculated as

DRAFT

the sum of current projection period items 1, 2, 30, 31, 59, 60 and the prior projection period's item 88.

Line Item 89 CS Warrants (Revised regulatory capital rule treatment – Common Equity Tier 1)

For the actual as-of date, report the carrying amount of warrants to issue common stock as defined in the FR Y-9C, Schedule HC, line item 24 and included in equity capital on the balance sheet.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 3, 32, 61 and actual as-of date item 89. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 3, 32, 61 and the prior projection period's item 89.

Line Item 90 CS USG Investment (Revised regulatory capital rule treatment – Common Equity Tier 1)

For the actual as-of date, report the carrying amount of warrants issued to the U.S. Department of Treasury to purchase common stock as defined in the FR Y-9C, Schedule HC, line item 24 of the reporting institution that is included in equity capital on the balance sheet included in the FR Y-9C, Schedule HC-M, line item 24(b).

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 4, 33, 62, and actual as-of date item 90. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 4, 33, 62 and the prior projection period's item 90

Line Item 91 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Common Equity Tier 1)

For the actual as-of date, report capital instruments issued by a fully consolidated subsidiary of the reporting institution to a third party investor that qualify for inclusion in common equity tier 1 capital as defined in the FR Y-9C, Schedule HC-R, Part I, line item 4). To qualify for inclusion in common equity tier 1 capital, the capital instruments must be issued by a depository institution or a foreign bank that is a consolidated subsidiary of a banking organization.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 5, 34, 63 and actual as-of date item 91. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 5, 34, 63 and the prior projection period's item 91.

Line Item 92 Other Common Equity Tier 1 Instruments (Revised regulatory capital rule treatment – Common Equity Tier 1)

For the actual as-of date, report as defined in the regulatory capital rule.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 6, 35, 64 and actual as-of date item 92. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 6, 35, 64 and the prior projection period's item 92.

Line Item 93 Non-Cumulative Perpetual Preferred (NCP) (Revised regulatory capital rule treatment – Additional Tier 1)

For the actual as-of date, report the amount of noncumulative perpetual preferred stock and related surplus included in the FR Y-9C, Schedule HC, line item 23, and any other capital instrument and related surplus that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

DRAFT

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 7, 36, 65 and actual as-of date item 93. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 7, 36, 65 and the prior projection period's item 93.

Line Item 94 NCPP Convertible (Revised regulatory capital rule treatment – Additional Tier 1)

For the actual as-of date, report the amount of NCPP Convertible securities and related surplus included in the FR Y-9C, Schedule HC, line item 23, that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 8, 37, 66 and actual as-of date item 94. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 8, 37, 66 and the prior projection period's item 94.

Line Item 95 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Additional Tier 1)

For the actual as-of date, report the amount of Mandatory Convertible Preferred (MCP) securities and related surplus included in the FR Y-9C, Schedule HC, line item 23, that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 9, 38, 67 and actual as-of date item 95. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 9, 38, 67 and the prior projection period's item 95.

Line Item 96 MCP USG Preferred (Revised regulatory capital rule treatment – Additional Tier 1)

For the actual as-of date, report the amount of mandatory convertible preferred securities issued to the U.S. Department of Treasury by bank and intermediate holding companies that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve included in the FR Y-9C, Schedule HC, line item 3 and Schedule HC-M, line item 24(a).

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 10, 39, 68 and actual as-of date item 96. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 10, 39, 68 and the prior projection period's item 96.

Line Item 97 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Additional Tier 1)

For the actual as-of date, report the amount of tier 1 minority interest not included in common equity tier 1 capital that is includable at the consolidated level as defined in the FR Y-9C, Schedule HC-R, Part I, line item 22. For tier 1 minority interest, there is no requirement that the subsidiary be a depository institution or a foreign bank. However, the instrument that gives rise to additional tier 1 minority interest must meet all the criteria for additional tier 1 capital instrument.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 11, 40, 69 and actual as-of date item 97. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 11, 40, 69 and the prior projection period's item 97.

Line Item 98 Other Additional Tier 1 Instruments (Revised regulatory capital rule treatment – Additional Tier 1)

DRAFT

For the actual as-of date, report the amount of all other capital instruments, other than those included in line items 93 through 97, that satisfy all the additional tier 1 criteria in 12 CFR 217.20(c) of the regulatory capital rules of the Federal Reserve.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 12, 41, 70 and actual as-of date item 98. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 12, 41, 70 and the prior projection period's item 98.

Line Item 99 Cumulative Perpetual Preferred (CPP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

For the actual as-of date, report the amount of Cumulative Perpetual Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 13, 42, 71 and actual as-of date item 99. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 13, 42, 71 and the prior projection period's item 99.

Line Item 100 CPP TARP Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

For the actual as-of date, report the amount of CPP TARP Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 14, 43, 72 and actual as-of date item 100. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 14, 43, 72 and the prior projection period's item 100.

Line Item 101 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

For the actual as-of date, report the amount of Mandatory Convertible Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 15, 44, 73 and actual as-of date item 101. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 15, 44, 73 and the prior projection period's item 101.

Line Item 102 MCP USG Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

For the actual as-of date, report the amount of MCP USG Preferred securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 16, 45, 74 and actual as-of date item 102. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 16, 45, 74 and the prior projection period's item 102.

DRAFT

Line Item 103 Cumulative Dated Preferred (TRUPS) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

For the actual as-of date, report the amount of Cumulative Dated Preferred (TRUPS) securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 17, 46, 75 and actual as-of date item 103. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 17, 46, 75 and the prior projection period's item 103.

Line Item 104 USG Preferred TRUPS (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

For the actual as-of date, report the amount of USG Preferred (TRUPS) securities that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 18, 47, 76 and actual as-of date item 104. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 18, 47, 76 and the prior projection period's item 104.

Line Item 105 Other Non-qualifying Instruments in Tier 1 (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 1)

For the actual as-of date, report the amount of all other capital instruments other than those included in line items 99 through 104 that were included in tier 1 capital (FR Y-9C, Schedule HC-R, Part I, line item 21) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 19, 48, 77 and actual as-of date item 105. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 19, 48, 77 and the prior projection period's item 105.

Line Item 106 Subordinated Debt (Revised regulatory capital rule treatment – Tier 2)

For the actual as-of date, report subordinated debt instruments that satisfy all eligibility criteria under the regulatory capital rules of the Federal Reserve and related surplus included in the FR Y-9C, Schedule HC-R, Part I, line item 27. Include instruments that were (i) issued under the Small Business Jobs Act of 2010, or, prior to October 4, 2010, under the Emergency Economic Stabilization Act of 2008 and (ii) were included in the tier 2 capital nonqualifying capital instruments (e.g., TruPS and cumulative perpetual preferred) under the Federal Reserve's general risk-based capital rules.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 20, 49, 78 and actual as-of date item 106. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 20, 49, 78 and the prior projection period's item 106.

Line Item 107 Capital Instrument Issued by Subsidiary (Revised regulatory capital rule treatment – Tier 2)

For the actual as-of date, report the amount of total capital minority interest not included in tier 1 capital, as defined in the FR Y-9C, Schedule HC-R, Part I, line item 29.

DRAFT

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 21, 50, 79 and actual as-of date item 107. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 21, 50, 79 and the prior projection period's item 107.

Line Item 108 Other Tier 2 Instruments (Revised regulatory capital rule treatment – Tier 2)

For the actual as-of date, report all other capital instruments, other than those included in line items 106 and 107, that satisfy all eligibility criteria under the regulatory capital rules of the Federal Reserve and related surplus included in the FR Y-9C, Schedule HC-R, Part I, line item 27.

In addition, report tier 2 capital non-qualifying capital instruments (e.g., TruPS and cumulative perpetual preferred) that have been phased-out of tier 1 capital in the FR Y-9C, Schedule HC-R, Part I, line item 21.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 22, 51, 80 and actual as-of date item 108. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 22, 51, 80 and the prior projection period's item 108

For items 109 through 115, holding companies may include in regulatory capital debt or equity instruments issued prior to September 12, 2010, that do not meet the criteria for additional tier 1 or tier 2 capital instruments in 12 CFR 217.20 of the regulatory capital rules but that were included in tier 1 or tier 2 capital respectively as of September 12, 2010 (non-qualifying capital instruments issued prior to September 12, 2010) up to the percentage of the outstanding principal amount of such non-qualifying capital instruments as of January 1, 2014, in Schedule HC-R, item 21.

Line Item 109 Cumulative Perpetual Preferred (CPP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

For the actual as-of date, report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 23, 52, 81 and actual as-of date item 109. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 23, 52, 81 and the prior projection period's item 109.

Line Item 110 CPP TARP Preferred (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

For the actual as-of date, report the amount of CPP TARP Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 24, 53, 82 and actual as-of date item 110. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 24, 53, 82 and the prior projection period's item 110.

Line Item 111 Mandatory Convertible Preferred (MCP) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

For the actual as-of date, report the amount of Mandatory Convertible Preferred (MCP) instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

DRAFT

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 25, 54, 83 and actual as-of date item 111. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 25, 54, 83 and the prior projection period's item 111.

Line Item 112 MCP USG Preferred(Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

For the actual as-of date, report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 26, 55, 84 and actual as-of date item 112. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 26, 55, 84 and the prior projection period's item 112.

Line Item 113 Cumulative Dated Preferred (TRUPS) (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

For the actual as-of date, report the amount of Cumulative Dated Preferred (TRUPS) instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 27, 56, 85 and actual as-of date item 113. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 27, 56, 85 and the prior projection period's item 113.

Line Item 114 USG Preferred TRUPS (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

For the actual as-of date, report the amount of Cumulative Perpetual Preferred instruments that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 28, 57, 86 and actual as-of date item 114. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 28, 57, 86 and the prior projection period's item 114.

Line Item 115 Other Non-qualifying Instruments in Tier 2 (Revised regulatory capital rule treatment – Non-qualifying Instrument in Tier 2)

For the actual as-of date, report the amount of all capital instruments other than the ones included in line items 109 through 114 that were included in tier 2 capital (FR Y-9C, Schedule HC-R, Part I, line item 28) and outstanding as of January 1, 2014, and that are subject to phase out.

For projection period PQ1, the item is calculated as the sum of projection period PQ1 items 29, 58, 87 and actual as-of date item 115. For projection periods PQ2 through PQ9, the item is calculated as the sum of current projection period items 29, 58, 87 and the prior projection period's item 115.

Line Item 116 Cash dividends declared on preferred stock

Report planned cash dividends declared on preferred stock, as defined in FR Y-9C, Schedule HI-A, line item 10.

DRAFT

Line item 117 Cash dividends declared on common stock

Report planned cash dividends declared on common stock, as defined in FR Y-9C, Schedule HI-A, line item 11.

Line item 118 Common shares outstanding (Millions)

Report the number (in millions) of common shares outstanding at the time dividends on common stock are declared such that line item 119 reflects the firm's intended quarterly distribution of common dividends per share.

Line item 119 Common dividends per share (\$)

Report the firm's intended quarterly distribution in common dividends per share.

DRAFT

Schedule D—Regulatory Capital Transitions (Discontinued)

DRAFT

Schedule E—Operational Risk

E.1—BHC, SLHC or IHC Legal Reserves Reporting

The BHC, SLHC or IHC Legal Reserves Reporting sub-schedule must be completed by all institutions. For each year, report the total dollar values of the institution's legal reserve balance, representing the total legal reserve balance that was included on the institution's financial statements for the as-of date. The BHC's or IHC's submission should contain annual legal reserve balances for at least five years through to the reporting quarter.

On a voluntary basis, report the total dollar value of the institution's legal reserves pertaining to repurchase litigation which was included on the institution's financial statements as part of the total legal reserve on the as-of date. Also please indicate the subset of this amount which is related only to contractual Representation and Warranty (R&W) claims (excluding any amounts set aside for damages, penalties, fees, etc).

E.2—Material Risk Identification

Note: This sub-schedule is only to be reported by firms subject to SR Letter 15-18.

In the table in the report form under Section A, provide a list of the firm's material operational risks included in the BHC Baseline and BHC Stress Operational Risk loss projections, along with the name of the business line impacted by the material risk loss estimation methodology used to estimate losses for the material risk, and loss contribution. Material operational risks are those which are considered material according to the BHC's risk management framework. Also, under section B, list any material risks that were excluded from the loss projections.

Column Definitions

Material Operational Risk Name and Brief Description: Name and a brief description of the material risk.

Business Line(s)/Firm-Wide: Name of the business line(s) impacted by the material operational risk. If the risk applies to all lines of business, report the business line as "Firm-Wide."

Loss Estimation Methodology(ies): Methodology used to estimate the operational risk losses for the risk listed (for example, scenario analysis, historical data, regression model, etc.).

BHC Baseline and BHC Stress Projection Amounts: the aggregate loss amount in millions.

E.3—Operational Risk Scenarios

This sub-schedule is only to be reported by firms subject to SR Letter 15-18.

In the table in the report form, provide a list of the firm's Operational Risk scenarios included in the BHC Baseline and BHC Stress Operational Risk loss projections including the scenario name and loss contribution for each scenario. Also provide total number of scenario included in the loss projections as well as percentage of operational loss generated using scenario in the BHC Baseline and BHC Stress Operational Risk loss projections. Note the methodology for applying scenario results to the loss

DRAFT

projections, such as model inputs, overlays, or other methods.

Column Definitions

Operational Risk Scenario Name: a brief description of each operational risk scenario with the firm assigned name which may be the same as the material risk the scenario represents.

BHC Baseline and BHC Stress Projection: the dollar contribution to the operational loss estimate for each scenario listed.

Schedule F – Business Plan Changes

These schedules are used to estimate the effect of a material change in business plan on a BHC's, SLHC's or IHC's asset, liability, and capital projections.³⁷ Examples of a material change in business plan could include a planned merger, change in a key business strategy, a significant investment, or a divestiture, provided that the divestiture has been completed or contractually agreed to prior to the submission deadline of FR Y-14A, Schedule A (Summary). Divestitures planned as part of a merger must also be contractually agreed to prior to the submission deadline.

BHCs, SLHCs and IHCs that include a material business plan change in their capital plan must report this schedule. Respondents should refer to the CCAR Instructions for a given year for a discussion of materiality. Schedules F.1 and F.2 should **only** be used to report material business plan changes that will derive from contractual agreements with another party. Overall projections of balances, liabilities, and capital, which include the assumed effects of run-off, growth, and contractual agreements, should be reported in the FR Y-14A Summary schedule. Schedule F seeks to isolate the projected effects of business plan changes from overall projections of these items for the BHC, SLHC or IHC and from projected growth. The data reported in Schedule F.1 reflects the quarter-over-quarter changes in

³⁷ A BHC or IHC is required to include in its capital plan a discussion of any expected changes to the BHC's or IHC's business plan that are likely to have a material impact on the BHC's or IHC's capital adequacy or liquidity. See 12 CFR 225.8(e)(2)(iv).

In this discussion, the BHC or IHC should consider not just the impacts of these expected changes, but also the potential adverse consequences should the actions not result in the planned changes—e.g., a merger plan falls through, a change in business strategy is not achieved, or there is a loss on the planned significant investment.

DRAFT

reported Summary schedule items that are attributable to business plan changes. Generally, BHCs, SLHCs and IHCs should not report items on Schedule F.1 as they appear in the FR Y-14A Summary schedule.

Unless instructed otherwise, firms with material business plan changes are only required to complete Schedules F.1 and F.2 for the supervisory baseline and supervisory severely adverse scenarios. Schedule F.1 and F.2 are annual schedules and need not be completed for the mid-cycle stress test.

Separately report this information for each of the supervisory scenarios (Supervisory Baseline and Supervisory Severely Adverse). BHCs, SLHCs and IHCs should complete one submission per scenario per material business plan change. Separate business plan changes (e.g., two separate material acquisitions) should be reported with different BPC identifiers (e.g., BPC 1 and BPC 2). If a BHC, SLHC or IHC reports more than one business plan change in any quarter of the projection horizon, the Federal Reserve may ask for additional information, which could include a more granular breakdown of change in asset, liability and capital projection by individual business plan change.

BHCs, SLHCs and IHCs should provide supporting documentation that includes any information relating to portfolio risk characteristics that has been collected during the BHC's, SLHCs or IHC's due diligence process. This supporting documentation should be uploaded to the IntraLinks collaboration site and categorized as:

Supporting Document → FR Y-14A – Sch F – Bus Plan Changes

F.1 – Material Business Plan Changes

Schedule F mirrors the structure of the FR Y-14A Summary schedule. Using that structure, for a given supervisory scenario, report in Schedule F.1 the dollar amount of the incremental effect of a material change in business plan on the balance sheet, income statement, RWA, retail balance and loss projections, and on items on the CCAR and DFAST capital worksheets. In quarters in which no change in business plan occurs, report zero for all fields.

The following items, which are derived by the Federal Reserve on the FR Y-14A Summary schedule, cannot be derived for business plan changes.³⁸ BHCs, SLHCs and IHCs should report the incremental effect of a material business plan change on these items directly in Schedule F.

For more information on these items, refer to Schedule A.1.a for Income Statement variables and Schedule A.1.d.1 for Capital Worksheet variables.

Summary, Income Statement (Schedule A.1.a)

- Item 63, Other Losses: Goodwill Impairment
- Item 64, Other Losses: Valuation Adjustment for firm's own debt under fair value option (FVO)
- Item 68a, ALLL, Prior Quarter
- Item 68b, Allowance for credit losses on held-to-maturity debt securities, prior quarter
- Item 68c, Allowance for credit losses on available-for-sale debt securities, prior quarter
- Item 68d, Allowance for credit losses on all other financial assets, prior quarter
- Item 117, Pre-provision net revenue: Net interest income
- Item 118, Pre-provision net revenue: Noninterest income

³⁸ Please refer to the technical instructions for a complete list of derived and reported items.

DRAFT

- Item 119, Pre-provision net revenue: Noninterest expense
- Item 120, Pre-provision net revenue: Pre-provision net revenue
- Item 126, Condensed income statement: Realized gains (losses) on available-for-sale securities, including OTTI
- Item 127, Condensed income statement: Realized gains (losses) on held-to-maturity securities, including OTTI
- Item 136, Repurchase Reserve/Liability for Mortgage Reps and Warranties: Reserve, prior quarter
- Item 137, Repurchase reserve/liability for mortgage reps and warranties: Provisions during the quarter
- Item 138, Repurchase reserve/liability for mortgage reps and warranties: Net charges during the quarter

Summary, Capital (Schedule A.1.d.1)

- Item 1, Schedule HI-A—Changes in Bank, Savings and Loan or Intermediate Holding Company Equity Capital: Total bank or intermediate holding company equity capital most recently reported for the end of previous QUARTER

If a BHC or IHC reports more than one business plan change in any quarter of the projection horizon, then the two business plan changes should be included in the BHC's or IHC's capital plan. In this case, the Federal Reserve may ask for additional information, which could include a more granular breakdown of change in asset, liability, and capital projection by individual business plan change. A firm's capital plan should include combining pro forma financial statements if the firm has projected a merger, and should include fair value adjustments applied to each acquired portfolio in order to arrive at its projected carry value if the firm has projected an acquisition.

Example of What to Report: Suppose that, as of 4Q17 (the data as of date for CCAR 2018), a BHC, SLHC or IHC has a US first lien mortgage portfolio of \$100 million which is projected to grow by \$5 million per quarter over the planning horizon. In the first quarter of the planning horizon (1Q17 for CCAR 2017) the BHC, SLHC or IHC completes a divestiture of a \$20 million portfolio and enters an agreement to acquire a \$40 million portfolio, estimated to close in the fourth quarter of the planning horizon (4Q17 for CCAR 2017). Further suppose that all of the projections mentioned above correspond to projections under the Supervisory Severely Adverse scenario.

On its FR Y-14A Summary schedule for the Supervisory Severely Adverse scenario, the BHC, SLHC or IHC would report the projected balances of its US first lien mortgage portfolio on Item 1 of the Retail Balance and Loss Projections worksheet (RBLP) (MDRM number CPSRP381). These balances would correspond to column in Exhibit 1, below.

The BHC, SLHC or IHC would also be required to submit a Y-14A Schedule F.1 for each supervisory scenario. In that submission, for the Supervisory Severely Adverse scenario, the BHC, SLHC or IHC would report the dollar amount of the effect that the acquisition and divestiture would have on the projected balances of its US first lien mortgage portfolio on Item 1 of the RBLP (MDRM number CBPRP381). These balances would correspond to column (4) in Exhibit 1, below.

DRAFT

(1)	(2)	(3)	(4)	
Projection Quarter	Y-14A Summary RBLP, Line 1	Portfolio Growth	FR Y-14A BPC RBLP, Line 1	
4Q15	100			
1Q16	85	5	-20	<- Divestiture
2Q16	90	5	0	
3Q16	95	5	0	
4Q16	140	5	40	<- Acquisition
1Q17	145	5	0	
2Q17	150	5	0	
3Q17	155	5	0	
4Q17	160	5	0	
1Q18	165	5	0	

Note: Column (3) of exhibit 1 is not explicitly reported in either the Y-14 Summary or Business Plan Changes schedules. It is included in exhibit 1 for illustration only.

F.2 – Pro Forma Combining Balance Sheet for Mergers and Material Acquisitions

If a BHC, SLHC or IHC reports a merger or material acquisition in Schedule F.1 (Material Business Plan Changes), then the BHC, SLHC or IHC must also complete Schedule F.2, the Pro Forma Combining Balance Sheet worksheet. In order to arrive at the post-acquisition fair value of an acquired portfolio as reported on the FR Y-14A Schedule F.1 Balance Sheet worksheet, Schedule F.2 requires that BHCs, SLHCs or IHCs report the pre-acquisition book value of the portfolio on the as-of date, any purchase accounting adjustments made to the portfolio value, and any fair value adjustments made. The sum of the pre-acquisition book value, purchase accounting adjustments, and fair value adjustments for a given portfolio should yield the post-acquisition fair value, reported on the Schedule F.1 Balance Sheet worksheet in the quarter in which the business plan change takes place.

In the field labeled “Pre-Acquisition Book Value,” enter the book value for the line item assigned to the balance sheet item by the seller. In the field labeled “Purchase Accounting Adjustments,” enter adjustments made to the pre-acquisition book value of the balance sheet item in order to arrive at its purchase price. In the field labeled “Fair Value Adjustments,” report the difference between the purchase price and the fair value of the balance sheet item as reported on the balance sheet of the firm at acquisition.

DRAFT

Collection of Supplemental CECL Information

Unless otherwise specified, this schedule is only to be completed by holding companies that have adopted ASU 2016-13 in the stress test cycle year of adoption.

Line Item 1 First quarter of CECL adoption

Report as a date the first quarter in which the actual or projected values for the FR Y-14A incorporate the adoption of CECL. For example, if PQ4 is the first quarter that incorporates the adoption of CECL, report the quarter end date for that PQ. If the actual values (i.e., not projected) values incorporate the adoption of CECL, report the as of date of the FR Y-14A filing.

Line Item 2 Institutions applying the CECL transition provision

An institution may elect to make a one-time election to use the CECL transition provision, as provided in section 301 of the regulatory capital rules. Such an institution is required to begin applying the CECL transition provision as of the institution's CECL adoption date. An electing banking organization must indicate in its Form FR Y-9C its election to use the CECL transition provision, by reporting the amounts in the affected line items of the regulatory capital schedule, adjusted for the transition provisions, beginning in the regulatory report for the quarter in which it first reports its credit loss allowances as measured under CECL. For example, if a firm will adopt ASU 2016-13 in 2020, the firm would report whether the transition provision will be elected on Form FR Y-9C and therefore must reflect the transition provision amounts in their projected quarters, on the FR Y-14A report as-of December 31, 2019. An institution that does not elect to use the CECL transition provision in the quarter that it first reports its credit loss allowances as measured under CECL would not be permitted to make an election in subsequent reporting periods.

An institution that will adopt CECL in the year immediately following the December 31 as of date and will elect to apply the CECL transition provision must enter "1" for "Yes" in this item for each period in which the institution applies the transition provisions. An institution that will adopt CECL in the year immediately following the December 31 as of date and will not elect to apply the CECL transition provision must enter a "0" for "No" in this item. An institution that will not adopt CECL in the year immediately following the December 31 as of date must leave this item blank.

Each institution should complete this item beginning in the FR Y-14A of the year prior to when it first reports its credit loss allowances as measured under CECL, and in each subsequent FR Y-14A thereafter until this item is removed. Effective December 31, 2026, this item will be removed because the optional three-year phase-in period will have ended for all electing institutions by the end of the prior calendar year. If an individual electing institution's three-year phase-in period ends before this item is removed (e.g., its phase-in period ends December 31, 2023), the institution would report in this item that its CECL transition election is no longer in effect by reporting a "0".

Line Item 2a Institutions applying the CECL transition provision: Retained Earnings

An institution that will adopt CECL in the year immediately following the December 31 as of date and has elected to apply the CECL transition provision must provide the effect of the CECL transition provision on retained earnings for each period in which the institution applies the transition provisions.

DRAFT

An institution that has elected not to apply the CECL transition provision or that will not adopt CECL in the year immediately following the December 31 as of date must enter 0 in this item.

Line Item 2b Institutions applying the CECL transition provision: DTAs from temporary differences

An institution that will adopt CECL in the year immediately following the December 31 as of date and has elected to apply the CECL transition provision must provide the effect of the CECL transition provision on DTAs from temporary differences for each period in which the institution applies the transition provisions.

An institution that has elected not to apply the CECL transition provision or that will not adopt CECL in the year immediately following the December 31 as of date must enter 0 in this item.

Line Item 2c Institutions applying the CECL transition provision: credit loss allowances eligible for inclusion in regulatory capital

An institution that will adopt CECL in the year immediately following the December 31 as of date and has elected to apply the CECL transition provision must provide the effect of the CECL transition provision on credit loss allowances eligible for inclusion in regulatory capital for each period in which the institution applies the transition provisions.

An institution that has elected not to apply the CECL transition provision or that will not adopt CECL in the year immediately following the December 31 as of date must enter 0 in this item.

Line Item 2d Institutions applying the CECL transition provision: average total consolidated assets

An institution that will adopt CECL in the year immediately following the December 31 as of date and has elected to apply the CECL transition provision must provide the effect of the CECL transition provision on average total consolidated assets for each period in which the institution applies the transition provisions.

An institution that has elected not to apply the CECL transition provision or that will not adopt CECL in the year immediately following the December 31 as of date must enter 0 in this item.

Line Item 2e Institutions applying the CECL transition provision: total leverage exposure

An institution that is subject to the supplementary leverage ratios and that will adopt CECL in the year immediately following the December 31 as of date and has elected to apply the CECL transition provision must provide the effect of the CECL transition provision on total leverage exposure for each period in which the institution applies the transition provisions.

An institution that has elected not to apply the CECL transition provision or that will not adopt CECL in the year immediately following the December 31 as of date must enter 0 in this item.

Line Item 3 Adoption of Current Expected Credit Loss Methodology – ASC Topic 326

DRAFT

An institution that will adopt ASU 2016-13 in the year immediately following the December 31 as of date should report in this item the cumulative-effect adjustment for the changes in the allowances for credit losses, net of any related deferred tax assets, recognized in retained earnings as if the institution had measured its credit loss allowances under CECL in the December 31 as of date of the year prior to when it first adopts CECL. For example, if an institution will adopt ASU 2016-13 in 2020, the institution would report this item as if it had adopted CECL as-of December 31, 2019. Exclude from this line item the gross up amounts of purchased credit-impaired assets to purchased credit-deteriorated assets.

An institution that will not adopt ASU 2016-13 in the year immediately following the December 31 as of date should leave this line item blank.

Line Item 4 Allowances for credit losses recognized upon the acquisition of purchased credit-deteriorated assets

An institution that will adopt ASU 2016-13 in the year immediately following the December 31 as of date should report in this item, as a positive number, the initial allowance for credit losses recognized on purchased credit-deteriorated assets as if the institution had measured its credit loss allowances under CECL in the December 31 as of date of the year prior to when it first adopts CECL. For example, if an institution will adopt ASU 2016-13 in 2020, the institution would report this item as if it had adopted CECL as-of December 31, 2019. This item is applicable both in the FR Y-14A submission prior to the year in which an institution adopts ASU 2016-13 and in any subsequent periods in which an institution acquires purchased credit-deteriorated assets. For those subsequent periods, an institution should report an amount in this line item only in the reporting period in which the purchased credit-deteriorated assets have been acquired.

An institution that will not adopt ASU 2016-13 in the year immediately following the December 31 as of date should leave this line item blank.

Line Item 5 Effect of adoption of current expected credit losses methodology on allowances for credit losses on loans and leases held for investment and held-to-maturity debt securities

An institution that will adopt ASU 2016-13 in the year immediately following the December 31 as of date should report in this item the change in the amount of allowances from initially applying ASU 2016-13 to these two categories of assets as if the institution had measured its credit loss allowances under CECL in the December 31 as of date of the year prior to when it first adopts CECL, including the initial allowance gross-up for any purchased credit-deteriorated assets held as of the effective date. For example, if an institution will adopt ASU 2016-13 in 2020, the institution would report this item as if it had adopted CECL as-of December 31, 2019. An institution that will not adopt ASU 2016-13 in the year immediately following the December 31 as of date should leave this line item blank.

For further information, see the FR Y-9C Glossary entry “Purchased Credit Deteriorated (PCD) Loans and Debt Securities.”

Line Item 6 Total allowance for credit losses

An institution that will adopt ASU 2016-13 in the year immediately following the December 31 as of date should report the total allowance for credit losses, as well as sub-items 6.a., 6.b, and 6.c, as if the

DRAFT

institution had measured its credit loss allowances under CECL in the December 31 as of date of the year prior to when it first adopts CECL. For example, if an institution will adopt ASU 2016-13 in 2020, the institution would report items 6, 6.a, 6.b, and 6.c as if it had adopted CECL as-of December 31, 2019. For further information, see the FR Y-9C Glossary entry "Allowance for Credit Losses."

An institution that will not adopt ASU 2016-13 in the year immediately following the December 31 as of date should leave this line item blank.

Line Item 6a Allowance for credit losses on loans and leases held for investment

An institution that will adopt ASU 2016-13 in the year immediately following the December 31 as of date should report the allowance for credit losses on loans and leases held for investment as if the institution had measured its credit loss allowances under CECL in the December 31 as of date of the year prior to when it first adopts CECL. An institution that will not adopt ASU 2016-13 in the year immediately following the December 31 as of date should leave this line item blank.

Line Item 6b Allowance for credit losses on held-to-maturity securities

An institution that will adopt ASU 2016-13 in the year immediately following the December 31 as of date should report the allowance for credit losses on held-to-maturity debt securities as if the institution had measured its credit loss allowances under 2016-13 in the December 31 as of date of the year prior to when it first adopts CECL. An institution that will not adopt ASU 2016-13 in the year immediately following the December 31 as of date should leave this line item blank.

Line Item 6c Allowance for credit losses on available-for-sale securities

An institution that will adopt ASU 2016-13 in the year immediately following the December 31 as of date should report the allowance for credit losses on available-for-sale debt securities as if the institution had measured its credit loss allowances under 2016-13 in the December 31 as of date of the year prior to when it first adopts CECL. An institution that will not adopt ASU 2016-13 in the year immediately following the December 31 as of date should leave this line item blank.

DRAFT

Appendix A: Supporting Documentation

This appendix sets forth requirements and supervisory expectations related to supporting documentation for BHCs, SLHCs and IHCs subject to the Y-14 reporting requirements. This document is primarily focused on helping to ensure that BHCs, SLHCs and IHCs subject to Y-14 reporting requirements provide accurate and comprehensive information for their Y-14 reports.

Large and complex firms and LISCC firms should provide the information set forth in this appendix A with their capital plan submission. In contrast, large and noncomplex firms should not provide this information in connection with their capital plan submission, but they may be required to produce these material upon request by the Federal Reserve.

In certain cases, this document describes additional expectations for certain capital planning practices to help support BHCs' and IHCs' Y-14 reporting. However, this document is not intended to describe the full set of expectations for capital planning. The full set of capital planning expectations have been consolidated in two Federal Reserve two supervisory letters, SR Letters 15-18 and 15-19, issued in December 2015. Importantly, those two SR letters clarify that the capital planning expectations for LISCC and large and lomplex firms (as defined in those letters) are higher than the expectations for large and noncomplex Firms (as defined in those letters). A BHC or IHC should refer to SR Letter 15-18 or SR Letter 15-19, as applicable, for the capital planning expectations applicable to that BHC or IHC (depending on the BHC's or IHC's size and complexity), as this document applies to all BHCs and IHCs subject to Y-14 reporting and does not differentiate between Large and Complex vs Large and Noncomplex Firms. To the extent that this appendix references expectations that may not applicable to a large and noncomplex firm pursuant to SR Letter 15-19, a large and noncomplex firm will not be held to those expectations but should instead refer to the expectations in SR Letter 15-19.

Schedule A – Summary

For each part of the Summary Schedule, BHCs, SLHCs and IHCs must submit supporting documentation that clearly describes the methodology used to produce the BHC's, SLHC's or IHC's projections. The supporting documentation should include the following:

Policies and Procedures

BHCs, SLHCs and IHCs should submit all policies and procedures related to the capital adequacy process, including the BHC's, SLHC's or IHC's model risk-management policies. The model risk management policies should provide the BHC's, SLHC's or IHC's general framework for model development, implementation and use; model validation, and governance policies and controls (consistent with supervisory guidance on model risk management), including oversight by specifying criteria and controls across various stages of the model lifecycle (Identification; Inventory/ Tracking; Development and Documentation; Independent Validation; Approval for Implementation; Ongoing monitoring; Model Retirement).

Documentation of Risk Measurement Practices

Capital plan submissions should include documentation of key risk identification and measurement practices supporting the BHC-wide or IHC-wide stress testing required in the capital plans. BHC and IHC submissions should also include internal documentation describing the BHC's or IHC's framework for development, calibration, estimation, validation, oversight, and escalation of key risk identification and measurement practices. As noted above, an assessment of the robustness of these practices is a

DRAFT

critical aspect of the supervisory assessment of capital planning processes as outlined in SR 15-18 and 15-19.

Model and Methodology Inventory Mapping to FR Y-14A

BHCs, SLHCs and IHCs should submit an inventory of all models and methodologies used to estimate losses, revenues, expenses, balances, and risk-weighted assets (RWAs) and the status of validation/independent review for each. The inventory should include mapping that clearly conveys the methodology used for each FR Y-14A product line under each stress scenario.

Methodology Documentation

BHCs, SLHCs and IHCs should include in their capital plan submissions thorough documentation that describes and makes transparent key methodologies and assumptions for performing stress testing on their portfolios. This documentation should describe how the BHC, SLHC or IHC translated the macroeconomic factors (or market shock for the Trading and Counterparty Risk sections) associated with the scenario into the BHC's, SLHC's or IHC's projections and technical details of any underlying statistical methods used, including information on model validation and independent review. Where judgment is an essential part of the projection, the methodology documentation should demonstrate the rationale and magnitude, as well as the process involved to ensure consistency of projections with scenario conditions. Methodology documentation should include, at a minimum, the following documents:

- **Methodology and Process Overview**

BHCs, SLHC's and IHCs should provide documentation that describes key methodologies, processes, and assumptions for performing stress testing on the BHC's, SLHC's or IHC's portfolios, business, and performance drivers. Documentation should clearly describe the model-development process, the derivation of outcomes, and validation procedures, as well as assumptions concerning the evolution of balance sheet and RWAs under the scenarios, changing business strategies, and other impacts to a BHC's, SLHC's or IHC's risk profile. Supporting documentation should clearly describe any known model weaknesses and how such information is factored into the capital plan.

- **Model Technical Documents**

BHCs, SLHC's and IHCs should submit model technical documentation for key models used to performing stress testing on the BHC's, SLHC's or IHC's portfolios. The documentation should include:

- A description of the model methodology;
- An explanation of the theory, logic, and design underlying the model methodology and support from published research and sound industry practice;
- A discussion of historical data set construction, including data sources, adjustments to the data set, and documentation validating the use of any external data;
- The rationale for portfolio segmentation and a discussion on how a particular methodology and model captures the key characteristics and the unique risk drivers of each portfolio segment;
- A description of model selection and specification, variable choice, and estimation methodology, including the statistical results used to arrive at the selected model;
- An analysis of the model output, including the congruence of inputs with the assumed economic scenario, the justification of any qualitative adjustment, along with the statistical analysis used to support the model output; and

DRAFT

- A model inventory log specifying, at a minimum, the model's version, the date of model approval, the date of its last revision, its intended use, the name of its model owner and developer, the model's priority, the date of the model's last independent validation, and the date of the model's next expected independent validation.

If third-party models are used, the documentation should describe how the model was constructed, validated, and any known limitations of the model. Documentation should clearly describe assumptions concerning new growth and changes to credit policy. Supporting documentation should transparently describe internal governance around the development of comprehensive capital plans. Documentation should demonstrate that senior management has provided the board of directors with sufficient information to facilitate the board's full understanding of the stress testing used by the firm for capital planning purposes.

- **Model Validation and Independent Review**

Models employed by BHCs, SLHCs and IHCs (either developed internally or supplied by a vendor) should be independently validated or otherwise reviewed in line with model risk management expectations presented in existing supervisory guidance, including Supervisory Letter SR 11-7. Institutions should provide model validation documentation on the following elements: conceptual soundness, inputs, transparency, implementation, reporting, model robustness and limitations, use of expert judgment, exception reports, outcomes analysis (back testing and/or benchmarking) and qualitative adjustments.

Validation documentation should include the BHC's, SLHC's or IHC's assessment of the vulnerability of their models to error, an understanding of any of their other limitations, and consideration of the risk to the BHC, SLHC or IHC should estimates based on those models prove materially inaccurate. Specifically, validation reviews should examine the efficacy of model use in both base case and stress scenarios. While the use of existing risk measurement models and processes provides a useful reference point for considering stress scenario potential loss estimates, validation efforts should consider whether these processes generate outputs that are relevant in a stressful scenario or if the use of models should be supplemented with other data elements and alternative methodologies. To the extent available, the above items should also be provided for any vendor supplied models used by the BHC, SLHC or IHC, along with any third party validation documentation available for the vendor supplied model.

- **Audit Reports**

BHCs, SLHCs and IHCs should submit audit reports from their internal audit of the capital adequacy process including reviews of the models and methodologies used in the process. (See "*Capital Planning at Large Bank Holding Companies: Supervisory Expectations and Current Range of Practice*").

- **Results Finalization and Challenge Materials**

BHCs, SLHCs and IHCs should ensure that they have sound processes for review, challenge and aggregation of estimates used in their capital planning processes. BHCs, SLHCs and IHCs should submit documentation providing transparency into the review, challenge, and aggregation processes and the finalization of results.

Within this methodology documentation, BHCs, SLHCs and IHCs should provide credible support for all assumptions used to derive loss estimates, including assumptions related to the components of loss,

DRAFT

severity of loss, and any known weaknesses in the translation of assumptions into loss estimates. BHCs, SLHCs and IHCs should demonstrate that these assumptions are clearly conditioned on the stated macroeconomic scenario, are consistent with stated business strategies, and reflect the competitive environment of each business line. If firm-specific assumptions (other than broad macroeconomic assumptions) are used, also describe these assumptions and how they relate to reported projections. If the BHC, SLHC or IHC models rely upon historical relationships, provide the historical data and clearly describe why these relationships are expected to be maintained in each scenario. The impact of assumptions concerning new growth or changes to credit policy on forecasted loss estimates relative to historical performance should be clearly documented.

While judgment is an essential part of risk measurement and risk management, including for loss forecasting, BHCs, SLHCs and IHCs should not be over-reliant on judgment to prepare their loss estimations without providing documentation or evidence of transparency and discipline around the process. BHCs, SLHCs and IHCs should adequately support their judgments and should ensure that judgments are in line with scenario conditions. BHCs, SLHCs and IHCs should be consistently conservative in the assumptions they make to arrive at loss rates. Where appropriate, documentation should quantify the impact of qualitative adjustments from modeled output.

Furthermore, within this methodology documentation, BHCs, SLHCs and IHCs should include a thorough discussion of any material deviations from the instructions and how the materiality of such deviations was decided upon.

Additional information to be included in the methodology documentation is described in more detail in sections A.1 – A.7 below.

Consolidated Pro Forma Financials Methodology

BHCs, SLHCs and IHCs should submit documentation that describes (1) how the various balance sheet and income statement line items were developed and reported, (2) the specific assumptions used to calculate regulatory capital, including a discussion of any proposed capital distributions, and (3) any other information necessary to understand the BHC's, SLHC's or IHC's capital calculations (e.g., calculations related to the projections of the deferred tax asset or servicing assets that may be disallowed for regulatory capital purposes). *Additional information to be provided as part of this documentation is outlined in section A.1 below for the FR Y-14A Income Statement, Balance Sheet, and Capital sub-schedules.*

Governance

BHCs, SLHCs and IHCs should include in their submission supporting documentation that transparently describes internal governance around the development of stress testing models and methodologies, and discuss how the stress testing methodologies have been implemented in the BHC's, SLHC's or IHC's existing firm-wide risk management practices. Furthermore, documentation should include a discussion of the stress testing outcomes in terms of the nature of the portfolio and the modeled scenario. The BHC, SLHC or IHC should demonstrate that senior management provided the board of directors with sufficient information to facilitate the board's full understanding of the stress testing used by the firm for capital planning purposes and allow for the appropriate level of challenge of assumptions and outcomes.

A.1 – Income Statement, Balance Sheet, and Capital

Income Statement, Balance Sheet, and Capital Sub-schedules

DRAFT

BHCs, SLHCs and IHCs should submit supporting documentation that clearly describes the methodologies used to make the loss, reserve change, and revenue projections that underlie the pro forma projections of equity capital. BHCs, SLHCs and IHCs may submit separate documents for different models/methodologies. Each BHC, SLHC or IHC should include in its supporting documentation a clear description of how the various balance sheet and income statement line items were reported.

Provide information on the specific assumptions used to calculate regulatory capital, including a discussion of any proposed capital distributions. When appropriate, clearly state assumptions related to the corporate tax rate and the evolution of the deferred tax assets. In situations where the BHC, SLHC or IHC chooses not to project components of the balance sheet, those components should be held constant at the last current level and the BHC, SLHC or IHC should explain why the zero delta assumption is appropriate in the given scenario.

BHCs, SLHCs and IHCs should submit any other information and documentation necessary to support or understand its capital calculations. For example, a BHC, SLHCs or IHC could show the calculations related to the projections of the deferred tax asset or servicing assets that may be disallowed for regulatory capital purposes. Where applicable, BHCs, SLHCs and IHCs should link the additional supporting documentation to the Summary Memo of Capital Methodology and Assumptions and the Capital sub-schedule.

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as follows using the metadata tags provided:

Supporting Materials → Consolidated Pro Forma Financials Methodology → General

If a BHC, SLHC or IHC submits separate documents for different models and/or methodologies, please identify the model and/or methodology in the Comment field.

A.2 – Retail

BHCs, SLHC and IHCs should submit separate documentation for their Retail-related projections. A BHC, SLHC or IHC may submit separate documents for different models and/or methodologies. Documentation should be submitted for all aspects of the retail portfolio, including purchased credit impaired loans and mortgage repurchase risk. Mortgage repurchase documentation should include descriptions of all important assumptions made in each scenario, including, but not limited to, assumptions about legal process outcomes and counterparty behavior. All retail documentation should include documentation of assumptions, governance, validation and independent review as outlined in the Supporting Documentation section of the Overview.

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as one of the following three document types (defined in the CCAR 2016 Summary Instructions and Guidance)

DRAFT

using the metadata tags provided:

Supporting Materials → Methodology and Process Overview → Retail

Supporting Materials → Methodology Technical Document → Retail

Supporting Materials → Model Validation → Retail

If a respondent submits separate documents for different models and/or methodologies, please identify the model and/or methodology in the Comment field

A.3 – Wholesale

BHCs, SLHCs and IHCs should submit separate documentation for their Wholesale (Corporate and CRE) loan balances and loss projections. A BHC, SLHC or IHC may submit separate documents for different models and/or methodologies. BHCs, SLHCs and IHCs should include supporting documentation that describes the key methodologies and assumptions for performing stress testing on each wholesale portfolio. Documentation should include an index of documents submitted, a general overview document providing a broad summary of the stress testing methodologies utilized, and detailed supporting documentation that clearly describe the model development process, the derivation of outcomes, and validation procedures as outlined below. The methodologies' formulaic specification, assumptions, numerical techniques, and approximations should be explained in detail with particular attention to both their merits and limitations.

Specifically, documentation should include:

- Discussion of historical data set construction, including data sources, adjustments to the data set, and documentation validating the use of any external data.
- Time period of model calibration.
- Rationale for portfolio segmentation and a discussion on how a particular methodology and model captures the key characteristics and the unique risk drivers of each portfolio segment.
- A description of how the loss estimates appropriately capture the severity of the macroeconomic scenario, reflecting both industry and borrower characteristics. Documentation should include a justification for explanatory variables selected, including coefficients from statistical models, measures of their statistical significance, and qualitative assessments where appropriate. Where relevant, descriptive statistics, including their mean, median, minimum, maximum, and standard deviation should be outlined.
- Step-by-step examples of loss calculation, including a transparent breakdown of all components of forecasted loss (i.e., probability of default, severity of loss, exposure at default) and how each component is adjusted for the given macroeconomic scenario.
- Discussion of how losses were distributed to each quarter in the forecasted period as it relates to changes in the macroeconomic factors within the modeled scenario.
- Qualitative or quantitative adjustment to main model output. Firms should perform pre-adjustment/post-adjustment loss analysis and supply that analysis for material disparity.

Where the current total balances in the wholesale line items do not tie directly to the corresponding category on the FR Y-9C, BHCs, SLHCs and IHCs should provide a reconciliation which accounts for all wholesale balances. To the extent that loss projection line items include the consolidation of various loan portfolios which have different risk characteristics, supporting documentation should break out the relevant sub-portfolio losses. Furthermore, BHCs, SLHCs and IHCs should provide supporting documentation and forecasts for any wholesale loan portfolios acquired after the beginning quarter of the stress scenario and/or for loans covered by loss sharing agreements with the FDIC.

DRAFT

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as one of the following three document types (defined in the CCAR 2016 Summary Instructions and Guidance) using the metadata tags provided:

Supporting Materials → Methodology and Process Overview → Wholesale

Supporting Materials → Methodology Technical Document → Wholesale

Supporting Materials → Model Validation → Wholesale

If a respondent submits separate documents for different models and/or methodologies, please identify the model and/or methodology in the Comment field.

A.4 – Loans Held for Sale and Loans Accounted for Under the Fair Value Option

BHCs, SLHCs and IHCs should submit separate documentation for their Fair Value Option and Held for Sale retail and wholesale loans. A respondent may submit separate documents for different models and/or methodologies. The documentation should include:

- Total loss and outstanding fair market value balances segmented by Commercial/Wholesale, Commercial Real Estate and Retail along with explanation as to the main drivers of loss for each category noted above.
- Please document the amount of funded and non-funded commitments for wholesale loans and for retail loans please include the average amount of loans that had been rejected or were in not in conformance with agency standards.
- An attestation to completeness: describe the process and governance & oversight for ensuring the full set of positions were accounted for and included,
- Documentation should clearly make note of instances where different methodologies were used across different business lines with like assets,
- Documentation should make note where judgment was used in defining and allocating exposure,
- Where shocks were used that differed from prescribed shocks,
- Document approach and asset coverage under these approaches,
- Describe any additional broadening or simplification of the scenario done to get the requisite amount of granularity needed to run to scenario,
- Scenario design and choice for BHC or IHC scenario and method of application compared to the FRB scenario.

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as one of the following three document types (defined in the CCAR 2016 Summary Instructions and Guidance) using the metadata tags provided:

Supporting Materials → Methodology and Process Overview → Wholesale or Retail

DRAFT

Supporting Materials → Methodology Technical Document → Wholesale or Retail

Supporting Materials → Model Validation → Wholesale or Retail

If a respondent submits separate documents for different models and/or methodologies, please identify the model and/or methodology in the Comment field.

A.5 – AFS/HTM Securities

For 2019 CCAR cycle, BHCs and IHCs should continue to submit supporting documentation on their OCI and OTTI projections. Starting from 2020 CCAR cycle, BHCs and IHCs that have not adopted ASU 2016-13 should continue to submit supporting documentation on their OCI and OTTI projections; BHCs and IHC that have adopted ASU 2016-13 should submit supporting documentations on their OCI, expected credit loss and provision projections. A BHC or IHC documentation should include documentation of methodologies/models, assumptions, governance, validation and independent review as outlined in the Supporting Documentation section of the Overview. A BHC or IHC may submit separate documents for different models and/or methodologies.

The documentation should, at a minimum, address the questions outlined below by major product/portfolio type (e.g., non-agency residential mortgage-backed securities (RMBS), commercial mortgage-backed securities (CMBS), auto asset-backed securities (ABS), corporate bonds, etc.).

Projected OTTI for AFS Securities and HTM Securities by CUSIP

OTTI Methodology³⁹

- Describe the model/methodology used to develop stressed OTTI losses. Please state whether a vendor or proprietary model was used.
- If a vendor model was used, please provide the name of the vendor model. If a vendor model was used, has the BHC, SLHC or IHC performed an independent review of the vendor model?
- What data source(s) was used to estimate the model?
- What were the key inputs/variables and how were these determined? (e.g., how were default, severity, and other elements determined? What were the key inputs in determining default, severity, and other elements? What were the key assumptions and how were these assumptions determined?)
- If using a cash flow model, was a vendor or proprietary model used? If using a vendor model, please provide the name of the vendor and model.
- How did the model/methodology (whether vendor or proprietary) incorporate macroeconomic assumptions?
- If relevant, how were macroeconomic assumptions (as prescribed under the supervisory stress scenario) used to determine projected collateral default and severity?
- Were all securities reviewed for impairment? If not, describe the rationale, decision rule, or filtering process.
- If the threshold for determining OTTI on structured products was based on a loss coverage multiple, describe the multiple used.
- If OTTI was estimated for multiple quarters, describe the process for determining OTTI in each period of the forecast time horizon.
- Is the BHC, SLHC or IHC using shortcuts or rules of thumb to recognize the OTTI charges for this analysis or going through the BHC's, SLHC's or IHC's normal process for recognizing OTTI

³⁹ The request for information associated with OTTI methodology will be eliminated upon full adoption of ASU 2016-13.

DRAFT

charges? If using shortcuts or rules of thumb, state how this process differs from the normal process for recognizing OTTI charges.

Fair Market Value Determination

- If more than one third-party vendor is used as the principal pricing source for a given security, what are the criteria for determining the final price? (e.g., is a mean, median, weighting scheme or high/low price taken?) Is there a hierarchy of sources? If appropriate, describe responses by major product or portfolio type (e.g., non-agency RMBS, CMBS, Consumer ABS).
- If an internal model is used as the principal pricing source for a given security, are prices (from an internally created model) compared with third party vendor prices? If so, which vendors are used? If prices are not compared with third party vendors, state the reason. If appropriate, describe responses by major product/portfolio type (e.g., non-agency RMBS, CMBS, Consumer ABS.).
- Describe any additional adjustments made to prices determined by internal model(s) and/or third parties. How is the ultimate price determined?
- If an internal model is used as the principal pricing source for a given security, what are the primary market pricing variables used for fair value estimation?
- Describe briefly the BHC's, SLHC's or IHC's price validation and verification process. Provide readily available documentation related to the BHC's, SLHC's or IHC's price validation and verification process.

Projected OCI and Fair Market Value for AFS Securities

- Describe the model/methodology used to develop stressed OCI losses. If appropriate, describe responses by major product or portfolio type (e.g., non-agency RMBS, CMBS, Consumer ABS). State whether the same model was used to derive OTTI losses. If not, detail the specific model/methodology and rationale for utilizing a different model.
- Detail if a vendor or proprietary model was used. If a vendor model was used, provide the name of the vendor model. If a vendor model was used, has the BHC, SLHC or IHC performed an independent review of the vendor model?
- What data source(s) was used to estimate the model?
- What were the key inputs/variables and how were these determined? (e.g., how were fair value losses, and other elements determined?) What were the key inputs in determining OCI loss and how were they determined?
- If using a cash flow model, was a vendor or proprietary model used? If using a vendor model, please provide the name of the vendor and model.
- How did the model/methodology (whether vendor or proprietary) incorporate macroeconomic assumptions? How were macroeconomic assumptions (as prescribed under the supervisory stress scenario) used to determine projected OCI?
- Were all securities reviewed for OCI? If not, describe the rationale, decision rule, or filtering process. If OCI was estimated for multiple quarters, describe the process for determining OCI in each period of the forecast time horizon.
- Is the BHC, SLHC or IHC using shortcuts or rules of thumb to recognize the OCI charges for this analysis or going through the BHC's, SLHC's or IHC's normal process for recognizing OCI charges? If using shortcuts or rules of thumb, state how this process differs from the normal process for recognizing OCI charges.

Expected Credit Loss and Provision for Credit Loss

DRAFT

- Describe the models/methodologies used to estimate expected credit losses and provision by major product or portfolio type. Documentation should include descriptions of all important assumptions, in particular the scenario assumptions and development process for expected credit losses and provision.

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as one of the following three document types (defined in the CCAR 2016 Summary Instructions and Guidance) using the metadata tags provided:

Supporting Materials → Methodology and Process Overview → Securities

Supporting Materials → Methodology Technical Document → Securities

Supporting Materials → Model Validation → Securities

If a respondent submits separate documents for different models and/or methodologies, please identify the model and/or methodology in the Comment field.

A.6 – Trading

- Documentation should include supporting details explaining the main drivers and attribution of loss for the overall trading and MTM loss estimate, and for each respective primary risk/business unit area details on the loss attribution by the primary risk factors.
- Documentation should provide a complete and technical definition of second and higher order risk factors (cross gamma, vanna, etc.) and describe the methods undertaken by the firm to estimate the cross gamma and higher order effects.
 - Estimate the contribution to total losses from higher-order risks.
- Describe the evolution of risk per each risk area two weeks before and after the submission date, i.e. make note of positions that may expire or terminate within this time frame that significantly alters a risk profile.
- Describe the process and governance & oversight for ensuring the full set of positions were accounted for and included and also please make note of differences in the products and/or exposures included in the FR Y-14Q vs. the FR Y-14A.
- A detailed and technical description of modeling methods (including pricing models) used,
 - Documentation should clearly make note of instances where different methodologies were used across different business lines with like assets.
 - Document approach (full revaluation vs. grid based approach, e.g.) and asset coverage under these approaches,
 - Please identify those products or exposures where the firm used models or systems that were outside of the normal routine stress testing framework for the FRB stress scenario and indicate if they were reviewed or validated by an independent Model Review function.
- The decision-making used for allocating exposures according to risk area. Documentation should make note where judgment was used in defining and allocating exposure per each risk area.

DRAFT

- Where shocks were used that differed from prescribed shock
- Describe any additional broadening or simplification of the scenario done to get the requisite amount of granularity needed to run to scenario,
- Scenario design and choice for BHC or IHC scenario and method of application compared to the FRB scenario.

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as one of the following three document types (defined in the CCAR 2016 Summary Instructions and Guidance) using the metadata tags provided:

Supporting Materials → Methodology and Process Overview → Trading

Supporting Materials → Methodology Technical Document → Trading

Supporting Materials → Model Validation → Trading

If a respondent submits separate documents for different models and/or methodologies, please identify the model and/or methodology in the Comment field.

A.7 – Counterparty Credit Risk

Instructions related to supporting documentation requirements for FR Y-14A Schedule A.5 can be found in the Supporting Documentation appendix of the FR Y-14Q instructions.

A.8 – Operational Risk

The reporting institution should provide any supporting information including statistical results, data, summary tables, and additional descriptions in a separate document and cross reference the document to the respective question/item. BHCs, SLHCs and IHCs may submit separate documents for different models and/or methodologies.

Documentation

Generally, a BHC, SLHC or IHC should have robust internal controls governing its operational risk loss projection methodology and process components, including sufficient documentation, model validation and independent review. Supporting documentation should cover all models, loss and resource forecasting methodologies and processes. Adequate documentation includes comprehensive and clear policies and procedures. For models, adequate documentation includes specific delineation of all key assumptions for projecting operational losses under each scenario, a description of the underlying operational risk data used to determine projected losses and the approach for translating the data into loss projections. If a budgeting process was used, the BHC, SLHC or IHC should describe the budgeting process and provide specific detail on how operational losses are estimated. Adequate documentation includes articulating the models' vulnerability to error, and estimates of an error's impact should parameter specifications prove inaccurate. Documentation of all models should clearly identify the exact statistical process employed by the BHC, SLHC or IHC including:

1. How the current set of explanatory factors was chosen, what variables were tested and then

DRAFT

- discarded, and how often the set of possible explanatory factors is reviewed and, if appropriate, revised;
2. If applicable, description of work the BHC, SLHC or IHC has done to assess relationships between macroeconomic factors and operational risk losses, including relationships that were found to have the highest level of dependency, a summary of statistical results, and how these results were incorporated in the estimates;
 3. A discussion of how pending litigation and reserves for litigation were incorporated into operational loss projections for all requested scenarios;
 4. A detailed, transparent, and credible description of the foundation, approach, and process for making management adjustments to modeled results;
 5. A description of the methodology for allocating an operational loss amount to a particular quarter;
 6. An explanation summarizing the reasonableness of results, how they differ from expectations, and what the BHC, SLHC or IHC does when the results are deemed "unreasonable";
 7. A description of internal controls that ensure the integrity of reported results and that all material changes to the process and its components are appropriately reviewed and approved. BHCs, SLHCs and IHCs should ensure that change control principles apply to forecasting models used in the stress scenario analysis program, including processes that rely on management judgment;
 8. An assessment of how effective or accurate the model is;
 9. Identification of possible drawbacks and limitations of the selected approach.

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as one of the following three document types (defined in the CCAR 2016 Summary Instructions and Guidance) using the metadata tags provided:

Supporting Materials → Methodology and Process Overview → Operational Risk

Supporting Materials → Methodology Technical Document → Operational Risk

Supporting Materials → Model Validation → Operational Risk

If a respondent submits separate documents for different models and/or methodologies, please identify the model and/or methodology in the Comment field.

A.9 – Pre-Provision Net Revenue (PPNR)

Each methodological memo should clearly describe how a BHC, SLHC or IHC approached the PPNR projection process and translated macro-economic factors into the reported projections. Separate documents may be submitted for different models and/or methodologies.

Projected Outcomes

- 1) Provide an explanation summarizing the reasonableness of projected outcomes relative to the stated macroeconomic scenario, business profile, as well as regulatory and competitive environment. Especially in the more adverse scenario(s), include substantial supporting evidence for PPNR estimates materially exceeding recently realized values.

DRAFT

- 2) BHCs, SLHCs and IHCs should discuss linkages between PPNR projections and the balance sheet as well as other exposure assumptions used for related loss projections.
- 3) Include discussion of PPNR outcomes by component (i.e. Net Interest Income, Non Interest Income, and Non Interest Expense) and by major source of each component (e.g. by major balance/rate category, type of revenue/expense, and/or business activity).
- 4) Consideration should be given to how changes in regulation will impact the BHC's, SLHC's or IHC's revenues and expenses over the projection period. The memo should include a section that addresses how recent or pending regulatory changes have impacted projected figures and business strategies and in which line items these adjustments are reflected.
- 5) For IHCs with material transfer priced, allocated or shared items with related entities, the IHC should attempt to allocate revenue items to the applicable business-line revenue PPNR reporting line, and non-interest expense items to the relevant non-interest expense PPNR reporting line. Revenue sharing arrangements should be reported on a net basis in the revenue line item most closely associated with the underlying activity, and not as expense items. IHCs should provide further documentation in their submission that clarifies the impact of these revenue arrangements, by business line where applicable.

Models and Methodology

- 1) The documentation should include a full list of all models and parameters used to generate projections of PPNR components for CCAR purposes and whether these models are also used as part of other existing processes (e.g. the business-as-usual budgeting and forecasting process). Where existing processes are leveraged, discuss how these are deemed appropriate for stress testing purposes, including any modifications that were necessary to fit a stressful scenario.
Also discuss those items that are particularly challenging to project and identify limitations and weaknesses in the process.
- 2) Thorough discussion of use of management/expert judgment, including information about rationale and process involved in translation of macroeconomic scenario variables into projections of various PPNR components should be provided. Where a combination of a modeled approach and management judgment was used to project an item, quantify the impact of qualitative adjustments to modeled output.
- 3) Provide support for all key assumptions used to derive PPNR estimates, with a focus on the link of these assumptions to projected outcomes and whether the assumptions are consistent with the stated macroeconomic scenario, regulatory and competitive environment as well as business strategies for each of major business activities. Document the impact of assumptions concerning new growth, divestitures or other substantial changes in business profile on PPNR estimates. In cases where there is a high degree of uncertainty surrounding assumptions, discuss and reference sensitivity of projections to these assumptions. Also ensure that all relevant macro-economic factors used for PPNR projections are also reported on the firm submitted Scenario Schedule.
- 4) In addition to broad macro-economic assumptions that will guide the exercise, it is expected that more specific assumptions will be used by BHCs, SLHCs and IHCs in projections of PPNR, including macro-economic factors other than those provided by the Federal Reserve System as well as BHC, SLHC and IHC specific assumptions. Such assumptions and their link to reported figures, standardized and/or BHC/SLHC/IHC business segments and lines should be discussed in the methodology memo.

DRAFT

- 5) Where historical relationships are relied upon (e.g. ratios of compensation expense to total revenues), BHCs, SLHC and IHCs are expected to document the historical data used and describe why these relationships are expected to hold true in each scenario, particularly under adverse conditions.
- 6) Projecting future business outcomes inevitably relies on the identification of key relationships between business metrics and other explanatory variables. Key limitations and difficulties encountered by the BHC, SLHC or IHC in the process to model these relationships should be identified and discussed in the memo.
- 7) Highlight changes in various aspects of BHC's, SLHC's or IHC's PPNR forecasting models and methodology, primarily focusing on the changes that occurred since the last CCAR submission.

Projections Governance and Data

- 1) BHCs, SLHCs and IHCs are asked to describe governance aspects for the PPNR projections development. This includes but is not limited to a description of:
 - a. The roles of various business lines and management teams involved in the process
 - b. How the projections are generated. Particular attention should be given to how the
BHC, SLHC and IHC ensures that assumptions are consistent across different business line projections, how assumptions are translated into projections of revenue and expenses, and the process of aggregating and reporting the results.
 - c. Senior management's involvement of the process and the process in which the assumptions are vetted and challenged.

Also note whether established policies and procedures are in place related to this process.

- 2) Also include a separate section devoted to any divergence from the instructions in completing the PPNR sub-schedules in the FR Y-14A and FR Y-14Q Schedules. Use this section to explain any data that is missing or not provided as requested. Use this section to discuss major instances where judgment was used to interpret PPNR instructions.
- 3) Discuss general data validation and reconciliation practices here as they pertain to FR Y-14Q/A submissions. PPNR is defined as the sum of net interest income and non-interest income net of non-interest expense, with components expected to reconcile with those reported in the FR Y-9C when adjusted for certain items (see "Commonly Used Terms and Abbreviations" section of FR Y14-Q/A PPNR instructions for guidance for such items). BHCs, SLHCs and IHCs are encouraged to include information allowing confirmation that the data were reported per the PPNR definition. Documentation should discuss consistency of a given schedule with the BHC's, SLHC's or IHC's external reporting and internal reporting and forecasting. Provide a description of broadly-defined types of business models currently used (e.g. Asset/Liability, Relationship, Business Product/Services/Activity as defined or named by the BHC, SLHC or IHC). Provide reconciliation between BHC, SLHC or IHC reporting used to manage and forecast operations and a standardized business segment/line view required for FR Y-14A reporting. Note if allocation methodologies were used when providing data for PPNR sub-schedules in FR Y-14A/Q Schedules.

DRAFT

- 4) Highlight changes in various aspects of BHC's, SLHC's or IHC's PPNR forecasting governance and data, primarily focusing on the changes that occurred since the last CCAR submission.

Other

- 1) BHCs, SLHCs and IHCs are also expected to address items requested in the Supporting Documentation portion of the Overview section (beginning on page 4) as applicable to PPNR if not already addressed per PPNR documentations guidance as stated above.
- 2) Other sections of the FR Y-14A and FR Y-14Q PPNR Instructions request additional information and supporting documentation. Please ensure that these items are also referenced and described in this memo. For example, include a discussion of small/medium/large business segmentation, as noted in section "B. PPNR Projections Sub-schedule."
- 3) BHCs, SLHCs and IHCs are encouraged to submit any other information and documentation (including data series) that would support the BHC's, SLHC's or IHC's PPNR projections. One example of such information would be identification and discussion of major deviations of BHC, SLHC or IHC historical performance from forecasted figures, focusing on the last four quarters and noting items that the BHC, SLHC or IHC regards as non-recurring and/or non-core. Where applicable, it would be useful to reference this additional supporting information in the memo outlined above

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as one of the following three document types (defined in the CCAR 2016 Summary Instructions and Guidance) using the metadata tags provided:

Supporting Materials → Methodology and Process Overview → PPNR/Balance Sheet

Supporting Materials → Methodology Technical Document → PPNR/Balance Sheet

Supporting Materials → Model Validation → PPNR/Balance Sheet

If a respondent submits separate documents for different models and/or methodologies, please identify the model and/or methodology as one of the following types in the Comment field:

1. Net interest income and banking book balances,
2. Trading and investment banking revenue and related balances, and
3. All other non-interest income, non-interest expense, and other balances.

A.10 – MSR Projection Documentation

Supporting documentation should address the questions outlined below.

1. Models and Methodologies

- Describe the models and related submodels that were used to complete the submission, and please state whether the model is a third-party vendor or proprietary model.
 - o Income/Expense/Valuation Engine
 - o Prepayment Model

DRAFT

- o Default Model
- o Delinquency Model
- o Hedging Simulation
- If a vendor model was used, please provide the name of the vendor model. If a vendor model was used, has the BHC, SLHC or IHC performed an independent review of the vendor model?
- Has the model undergone rigorous model validation, with results reviewed independently of the business line?
- Has any performance testing been conducted on the model? If so, what type of performance testing has been conducted?
- What data sources were used to calibrate each model?
- What were the key inputs/variables and how were these determined?
- How did the model (whether vendor or proprietary) incorporate macroeconomic assumptions?

2. Assumptions

- For each quarter, what new loan capitalizations and amortizations are assumed over both the baseline and supervisory stress scenarios?
 - How were the new loan capitalization forecast assumptions developed?
 - What excess spread assumptions were made with respect to new loan capitalizations in each scenario and how was this assumption derived (e.g., historical buy-up/buy-down grids, etc.)?
 - How were HARP assumptions, if any, estimated?
 - What market share is assumed, and does this change within the stress scenario?
 - Does the submission include any MSR sales or purchases under the supervisory stress? If yes, please provide detail.
- What is the composition of the underlying portfolio of loans serviced for others with respect to the following, and how does this composition change (if at all) during the supervisory stress scenario?
 - i. Loan type
 - ii. Geographical region
 - iii. FICO score
- How were macroeconomic assumptions as prescribed under the supervisory baseline and stress scenarios used to determine the respective projected loan prepayment, delinquency, and default experience for each quarter?
- How were macroeconomic assumptions that were not prescribed under the supervisory baseline and stress scenarios (for example, interest rate volatility, option adjusted spreads, primary to secondary spreads) used to determine the respective projected loan prepayment, delinquency, and default experience for each quarter?
- What are the voluntary prepayment speeds (e.g., conditional prepayment rates (CPRs) associated with refinancing) assumed for each quarter in the respective baseline and supervisory stress scenarios? Do not include constant default rates (CDRs).
- What are the factors that drive or explain the level and trend in prepayment speeds through the nine quarters over the baseline and supervisory stress scenarios?
- What are the default rates assumed for each quarter in the respective baseline and supervisory stress scenarios?
- What are the factors that drive or explain the level and trend in default rates through the nine quarters over the baseline and supervisory stress scenarios?
- How were the assumptions regarding cost of service with respect to both the baseline and stressed scenarios derived?
- Was inflation incorporated into the projection?

DRAFT

- What is the servicing cost structure on a per loan basis on a base and incremental basis for each level of delinquency? What are the foreclosure costs per loan?
- Does the cost structure per loan stay the same throughout the nine quarters with the number of delinquent loans changing, or do both change?
- What foreclosure time frames are used in the baseline scenario? Do these lengthen or contract in the supervisory stress?
- Is late fee income included in the submission?
 - If so, what is the BHC's, SLHC's or IHC's actual late fee income structure, as well as waiver policy if applicable?
 - What is the late fee income assumed in the baseline and stress scenarios?
 - Is it assumed that late fees are 100% collectable in the stress scenario?
- Are earnings on escrow and other balances included in the submission?
 - If yes, how are the balances forecasted, and what is the crediting rate?
- Is cost to finance advances to investors relating to delinquent loans incorporated in the submission?
 - If yes, how is the borrowing rate determined?

3. Hedging and Rebalancing

- Are MSR hedges assumed to be rebalanced or rolled-over at any time during the nine quarter CCAR horizon? How often are hedges assumed to be rebalanced or rolled-over? What is the timing of such rebalancing or roll-over trades?
- What are the hedge rebalancing and/or roll-over rules applied during the baseline and stress scenarios?
- Are the hedge rebalancing and/or roll-over rules applied in the baseline and stress scenarios consistent with the firm's risk appetite statement and Board/management approved limit structure?
- To what degree does hedge effectiveness decline in the stress scenarios? How was this estimated?
- How is the impact of hedging instrument bid-ask spreads captured in the submission? To what degree does the bid-ask spread widen in the stress scenario? How was this estimated?
- How does the firm account for the liquidity risk from concentrated hedge positions?
- What is assumed regarding collateral requirements?
- What are the current risk tolerance limits with respect to MSR hedging

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as one of the following three document types (defined in the CCAR 2016 Summary Instructions and Guidance) using the metadata tags provided:

Supporting Materials → Methodology and Process Overview → PPNR/Balance Sheet

Supporting Materials → Methodology Technical Document → PPNR/Balance Sheet

Supporting Materials → Model Validation → PPNR/Balance Sheet

In the Comment field, please identify the document as "MSR".

A.11 Documenting Consideration of Certain Off-Balance Sheet Risks

DRAFT

Supporting documentation should clearly highlight how each institution (i) identified unconsolidated entities and sponsored products to which the Firm has potential exposure, (ii) evaluated those entities / sponsored products under stressed scenario conditions, and (iii) projected and reported any associated financial losses – whether in the form of non-contractual support or reflected elsewhere in PPNR (e.g., foregone revenue).

1. *Identification:* The submission should include a complete inventory of all off-balance sheet entities and sponsored products. Those assessed collectively may be aggregated for the purposes of reporting the information requested below, except that all investment management products that seek to maintain a stable net asset value (NAV) should be listed separately. Please include, at a minimum, the following information related to unconsolidated entities / sponsored products:
 - Product category. For example, Asset-Backed Commercial Paper conduits, Real Estate Investment Trusts, Hedge Funds, SEC-registered mutual funds, Collective Investment Funds, etc.
 - Total assets by product or category (for those that are aggregated).
 - Revenues earned by product or category for the most recent four quarters and a description of the nature of such revenues.
 - Product name and/or unique identifier for those listed separately
 - For stable NAV funds only, the regulatory framework by which each product is offered. For example, Investment Company Act of 1940, Rule 12 CFR 9.18, etc.

Each firm should also include a brief description of the process utilized to develop the inventory.

2. *Evaluation Methodology:* Clearly describe the methodology that was applied to the inventory in order to determine the unconsolidated entities / sponsored products for which there is a potential for non-contractual support, for example based on client expectations. This should include even those entities / sponsored products which the firm may choose not to support but such a decision could lead to lost revenues and/or other costs. Indicate the resulting decision for each product or category.
3. *Determination of Related Losses:* For each unconsolidated entity / sponsored product for which it was determined that a client expectation of non-contractual support may exist:
 - a) Describe the expected impact of macroeconomic and/or idiosyncratic stress factors to these entities / sponsored products.
 - This might include, but is not limited to, market value shocks, increased redemption activity, rollover risk, counterparty-default-related losses, etc.
 - Critical assumptions such as assumed counterparty LGD rates, velocity of redemptions amid stress, and nature of market shocks should be highlighted.
 - b) Describe the decision framework applied in determining whether non-contractual support would be provided and include a discussion of the identified costs/benefits related to each decision by major category and/or product.
 - c) Quantify and provide calculations of any related financial losses expected to be borne by the firm either in the form of non-contractual support or lost revenues and legal/operational costs and provide related calculations of those losses.
 - This should include both direct impacts (e.g., product closure and/or potential litigation costs) and indirect (i.e., second-order) impacts, such as lost revenue in

DRAFT

other products that results from client attrition, where a decision to not support has been applied.

- d) Clearly indicate the line items within the Y-14A summary schedule where such projected financial losses have been recorded.

Schedule B – Scenario

No supporting documentation is required for this schedule.

Schedule C – Regulatory Capital Instruments

No supporting documentation is required for this schedule.

Schedule D – Regulatory Capital Transitions

Additional Information Required for SIFI Surcharge

In November 2011, the Basel Committee on Banking Supervision (BCBS) published its methodology for assessing an additional loss absorbency requirement for global systemically important banks (SIFI surcharge) that effectively serves as an extension of the capital conservation buffer. **As part of the FR Y-14A filing, each BHC and IHC must submit a separate document that includes management’s best estimate of the likely SIFI surcharge that would be assessed under this methodology, along with an explanation of assumption used when determining the estimate.** Any BHC or IHC not currently designated as a global systemically important financial institution (G-SIFI) should include a SIFI surcharge assessment if management expects changes to its business model that would potentially lead to the BHC’s or IHC’s designation as a G-SIFI. Supervisors will evaluate the methodology and assumptions used by BHCs and IHCs in determining the SIFI surcharge, and may adjust such estimates as necessary when evaluating the Revised Capital Framework transition path.

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as one of the following three document types (defined in the CCAR 2016 Summary Instructions and Guidance) using the metadata tags provided:

Supporting Materials → Methodology and Process Overview → Regulatory Capital

Supporting Materials → Methodology Technical Document → Regulatory Capital

Supporting Materials → Model Validation → Regulatory Capital

In the Comment field, please identify the document as “SIFI surcharge”.

Note that if this information is already included the BHC’s or IHC’s CCAR Capital Plan, then the BHC or IHC has the option of simply including text that clearly describes location of this information (e.g. file name, document page number, section title, etc.). If the BHC or IHC uses this option, the document should still use the naming convention described above.

Additional Information Required for Each Planned Action (Tied to Sub-schedule 6) for FR Y-14A submission

BHCs and IHCs are required to provide a detailed description of each planned action in a separate attachment(s). The description of each planned action should include:

- Discussion of how each planned action aligns with the BHC’s or IHC’s long term business strategy and risk appetite on a going concerns basis;

DRAFT

- Assessment of each planned action’s impact on the BHC’s or IHC’s capital and funding needs, earnings, and overall risk profile;
- Assessment of market conditions and market capacity around each planned action (e.g., planned sale size and the availability and appetite of buyers and other potential sellers);
- Assessment of any potential execution risks to each planned action (e.g., contractual, accounting or structural limitations). The estimation of execution risk should be well documented for each planned action that are to occur;

Discussion of any recent transactions conducted either by the BHC or IHC or by other institutions that would demonstrate or support the BHC’s or IHC’s ability to execute each planned action at the level of impact projected.

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as follows using the metadata tags provided:

Supporting Materials → Methodology and Process Overview → Regulatory Capital

In the Comment field, please identify the document as “Planned Capital Action” and include the appropriate “Action #” in column A of the Planned Actions Sub-schedule.

Included below are examples of other supporting documentation which should be included along with the description of each planned action:

- Detailed information on planned sales such as risk profile and size of the positions, indicative term sheets and contracts; potential buyer information; current marked to market (MTM), support for the execution price; potential associated loans, financing, or liquidity credit support arrangements; potential buy back commitments; and impact on any offsetting positions. If similar recent transactions have taken place, BHCs and IHCs should provide information as a point of reference. BHCs and IHCs should also describe any challenges that may be encountered in executing the sale.
- Detailed information on planned unwinds, such as risk profile and size of the positions, profit and loss (P&L) impact at execution or in the future; funding implications; impact on any offsetting positions; and trigger of consolidation or on-boarding of the underlying assets.
- Detailed information on planned run-offs, such as risk profile and size of the positions, impact on any offsetting positions; details on trades; and maturity dates.
- Detailed information on planned hedging, such as indicative term sheets and contracts; P&L impact at execution or during life of the hedges; and impact on counterparty credit RWA.
- Detailed information on changes to risk-weighted assets calculation methodologies, such as which data or parameters would be changed, whether the firm has submitted model application to its supervisors, and remaining work to be completed and expected completion date.
- Detailed information on expanded use of clearing houses, such as types of products to be cleared and central counterparties to be used.

BHCs and IHCs should also provide detailed information on any alternative Regulatory Capital Transitions action plans in the event the firm falls short of the targets outlined in the Capital Plan, and trigger events that would result in a need to pursue any alternative action plans.

IntraLinks Instructions: When uploading the supporting documentation to the IntraLinks collaboration site, supporting documents for this specific area should be categorized as follows using the metadata tags provided:

DRAFT

Supporting Materials → Methodology and Process Overview → Regulatory Capital

In the Comment field, please identify the document as “Regulatory Capital Transitions action plan”.

Schedule E - Operational Risk

No supporting documentation is required for this schedule.