

# DRAFT

Modified July 2020

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

## Instructions for the Capital Assessments and Stress Testing information collection (Reporting Form FR Y-14Q)

All revisions are effective for the September 30, 2020, as of date, except those indicated in orange or green. Revisions in orange are effective for the December 31, 2020, as of date and revisions in green are effective for the June 30, 2021, as of date. Please note that revisions associated with the July 8, 2020, Federal Register notice (85 FR 41040) are not reflected in this document.

Also note that revisions in purple are proposed as part of a separate Federal Register notice.

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 4 to 1,926 hours per response, with an average of 243 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

<b>GENERAL INSTRUCTIONS</b> .....	<u>44</u>
<b>WHO MUST REPORT</b> .....	<u>44</u>
<b>WHERE TO SUBMIT THE REPORTS</b> .....	<u>66</u>
<b>WHEN TO SUBMIT THE REPORTS</b> .....	<u>66</u>
<b>HOW TO PREPARE THE REPORTS:</b> .....	<u>88</u>
<b>Schedule A – Retail</b> .....	<u>1211</u>
<b>A.1 – INTERNATIONAL AUTO LOAN</b> .....	<u>1211</u>
<b>A.2 – US AUTO LOAN</b> .....	<u>1716</u>
<b>A.3 – INTERNATIONAL CREDIT CARD</b> .....	<u>2322</u>
<b>A.4 – INTERNATIONAL HOME EQUITY</b> .....	<u>2726</u>
<b>A.5 – INTERNATIONAL FIRST LIEN MORTGAGE</b> .....	<u>3130</u>
<b>A.6 – INTERNATIONAL OTHER CONSUMER SCHEDULE</b> .....	<u>3534</u>
<b>A.7 – US OTHER CONSUMER</b> .....	<u>3837</u>
<b>A.8 – INTERNATIONAL SMALL BUSINESS</b> .....	<u>4140</u>
<b>A.9 – US SMALL BUSINESS</b> .....	<u>4544</u>
<b>A.10 – STUDENT LOAN</b> .....	<u>4847</u>
<b>Schedule B—Securities</b> .....	<u>5251</u>
<b>B.1—SECURITIES 1 (“MAIN SCHEDULE”)</b> .....	<u>5251</u>
<b>B.2—SECURITIES 2 (“INVESTMENT SECURITIES WITH DESIGNATED ACCOUNTING HEDGES”)</b> .....	<u>5857</u>
<b>Schedule C—Regulatory Capital Instruments</b> .....	<u>6261</u>
<b>C.1—REGULATORY CAPITAL AND SUBORDINATED DEBT INSTRUMENTS AS OF QUARTER END</b> .....	<u>6261</u>
<b>C.2—REGULATORY CAPITAL AND SUBORDINATED DEBT INSTRUMENT REPURCHASES/REDEMPTIONS DURING QUARTER</b> .....	<u>6463</u>
<b>C.3 – REGULATORY CAPITAL AND SUBORDINATED DEBT INSTRUMENTS ISSUANCES DURING QUARTER</b> .....	<u>6564</u>
<b>Schedule D—Regulatory Capital</b> .....	<u>7069</u>
<b>Schedule E—Operational Risk</b> .....	<u>7775</u>
<b>E.1—OPERATIONAL LOSS HISTORY</b> .....	<u>7775</u>
<b>E.2. INTERNAL BUSINESS LINE</b> .....	<u>8482</u>
<b>E.3. UNIT-OF-MEASURE (UOM)</b> .....	<u>8583</u>
<b>E.4. THRESHOLD INFORMATION</b> .....	<u>8583</u>
<b>E.5—LEGAL RESERVES FREQUENCY</b> .....	<u>8684</u>
<b>Schedule F—Trading</b> .....	<u>8987</u>
<b>GLOSSARY</b> .....	<u>9289</u>
<b>REGIONAL GROUPINGS</b> .....	<u>9491</u>
<b>F.1—EQUITY BY GEOGRAPHY</b> .....	<u>9693</u>
<b>F.2—EQUITY SPOT-VOL GRID</b> .....	<u>9794</u>
<b>F.3—OTHER EQUITY</b> .....	<u>9895</u>
<b>F.4—FX SPOT SENSITIVITIES</b> .....	<u>9996</u>
<b>F.5—FX VEGA</b> .....	<u>10097</u>
<b>F.6—RATES DV01</b> .....	<u>10198</u>
<b>F.7—RATES VEGA</b> .....	<u>103100</u>
<b>F.8—OTHER RATES</b> .....	<u>104101</u>
<b>F.9—ENERGY</b> .....	<u>105102</u>

# DRAFT

F.10—METALS .....	<a href="#">106103</a>
F.11—AGS & SOFTS .....	<a href="#">107104</a>
F.12—COMMODITY INDICES .....	<a href="#">108105</a>
F.13—COMMODITY SPOT-VOL GRIDS .....	<a href="#">109106</a>
F.14—SECURITIZED PRODUCTS .....	<a href="#">111108</a>
F.15—AGENCIES .....	<a href="#">112109</a>
F.16—MUNIS .....	<a href="#">113110</a>
F.17—AUCTION RATE SECURITIES (ARS) .....	<a href="#">115111</a>
F.18—CORPORATE CREDIT-ADVANCED .....	<a href="#">116112</a>
F.19—CORPORATE CREDIT-EMERGING MARKETS .....	<a href="#">118114</a>
F.20—SOVEREIGN CREDIT .....	<a href="#">120116</a>
F.21—CREDIT CORRELATION .....	<a href="#">122118</a>
F.22—IDR-CORPORATE CREDIT .....	<a href="#">124120</a>
F.23—IDR-JUMP TO DEFAULT .....	<a href="#">128122</a>
F.24—PRIVATE EQUITY .....	<a href="#">129123</a>
F.25—OTHER FAIR VALUE ASSETS .....	<a href="#">130124</a>
<b>Schedule G—PPNR .....</b>	<a href="#">131125</a>
G.1—PPNR SUBMISSION WORKSHEET .....	<a href="#">134128</a>
G.2—PPNR NET INTEREST INCOME (NII) WORKSHEET .....	<a href="#">148142</a>
G.3—PPNR METRICS .....	<a href="#">156150</a>
<b>Schedule H—Wholesale Risk .....</b>	<a href="#">168162</a>
H.1 - CORPORATE LOAN DATA SCHEDULE .....	<a href="#">168162</a>
H.2 - COMMERCIAL REAL ESTATE SCHEDULE .....	<a href="#">228218</a>
H.3 - LINE OF BUSINESS SCHEDULE .....	<a href="#">264252</a>
H.4 - INTERNAL RISK RATING SCHEDULE .....	<a href="#">265253</a>
<b>Schedule J - Retail Fair Value Option/Held for Sale (FVO/HFS) .....</b>	<a href="#">268256</a>
<b>Schedule K - Supplemental .....</b>	<a href="#">271259</a>
<b>Schedule L - Counterparty .....</b>	<a href="#">Error! Bookmark not defined.262</a>
<b>Schedule M—Balances .....</b>	<a href="#">311292</a>
<b>Appendix A: FR Y-14Q Supporting Documentation .....</b>	<a href="#">320300</a>
SUPPORTING DOCUMENTATION FOR SCHEDULE C – REGULATORY CAPITAL INSTRUMENTS .....	<a href="#">320300</a>
SUPPORTING DOCUMENTATION FOR SCHEDULE D – REGULATORY CAPITAL .....	<a href="#">320300</a>
SUPPORTING DOCUMENTATION FOR SCHEDULE L – COUNTERPARTY .....	<a href="#">320300</a>

# DRAFT

## INSTRUCTIONS FOR PREPARATION OF Capital Assessments and Stress Testing Report FR Y-14Q

### GENERAL INSTRUCTIONS

The Capital Assessments and Stress Testing Report (FR Y-14Q report) collects detailed data on bank holding companies' (BHCs) and intermediate holding companies' (IHCs) and covered savings and loan holding companies' (SLHCs)<sup>1</sup> various asset classes, capital components, and categories of pre-provision net revenue (PPNR) on a monthly or quarterly basis, which will be used to support supervisory stress testing models and for continuous monitoring efforts.

The FR Y-14Q report is comprised of Retail, Securities, Regulatory Capital Instruments, Regulatory Capital, Operational, Trading, PPNR, Wholesale, MSR Valuation Schedule, Retail Fair Value Option/Held for Sale, Supplemental, Counterparty and Balances schedules, each with multiple supporting worksheets. All of the data schedules are to be submitted for each reporting period unless materiality thresholds apply. The number of schedules a BHC or IHC must complete is subject to materiality thresholds and certain other criteria.

BHCs and IHCs may also be 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 the Supporting Documentation instructions (Appendix A). When submitting supporting documentation, provide each response in a separate document.

### Who Must Report

#### A. Reporting Criteria

Bank holding companies (BHCs) with total consolidated assets of \$100 billion or more, and intermediate holding companies (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 rule on savings and loan holding companies (12 CFR part 238), are required to submit the Capital Assessment and Stress Testing report (FR Y14A/Q/M) to the Federal Reserve. 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 Y14A 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.

---

<sup>1</sup> Covered SLHCs are SLHCs that are not substantially engaged in commercial or insurance activities. See 12 CFR 217.2; 238.2(ee) (definitions of "covered savings and loan holding company").

# DRAFT

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 or IHC must submit a specific schedule, worksheet, or data element. A BHC or IHC must fill out all of the schedules of the FR Y-14M and FR Y-14Q where the BHC or IHC meets the materiality definition. When applicable, the definition of the BHC's or IHC's or SLHC's submissions should correlate to the definitions outlined by the corresponding MDRM code within the FR Y-9C report.

All schedules are required to be reported by all BHCs, IHCs and SLHCs with exceptions as described below:

**PPNR, Regulatory Capital, Regulatory Capital Instruments and Balances schedules:** All bank and intermediate holding companies must submit these schedules.

**PPNR and Balances schedules:** All SLHCs must submit these schedules.

**Trading and Counterparty schedules:** Only BHCs, IHCs or SLHCs subject to supervisory stress tests and that [, as of two quarters preceding the reporting quarter](#), (1) have [, on average for four quarters](#), 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 rule<sup>2</sup> or SLHCs subject to Category IV standards under the Board's savings and loan holding company rule must submit this schedule and worksheets.<sup>3</sup> [For example, if a firm exceeded the threshold calculated as of the second quarter of a given year, then they would be required to file these schedules as of the fourth quarter of a given year.](#)

**All other schedules:** Reporting of the remaining schedules is subject to materiality thresholds.

**For large and noncomplex firms<sup>4</sup> and SLHCs subject to Category IV standards<sup>5</sup>:** Material portfolios are defined as those with asset balances greater than \$5 billion or with asset balances greater than ten percent of Tier 1 capital on average for the four quarters preceding the reporting period.

**For large and complex or LISCC firms<sup>6</sup> and SLHCs subject to Category II and III standards<sup>7</sup>:** Material portfolios are defined as those with asset balances greater than \$5 billion or asset balances greater than five percent of Tier 1 capital on average for the four quarters preceding the reporting period.

For schedules that require the institutions to report information on serviced loans, the materiality threshold is based on the asset balances associated with the BHC's or IHC's or SLHC's owned portfolio. All data used to

---

<sup>2</sup> 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).

<sup>3</sup> 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.

<sup>4</sup> 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.

<sup>5</sup> Category IV standards apply to covered SLHCs with \$100 billion or more in total consolidated assets that do not meet the criteria for Categories II or III. [See](#) 12 CFR 238.10.

<sup>6</sup> A LISCC firm is a BHC subject to the Federal Reserve's Large Institution Supervisory Coordinating Committee (LISCC) framework. A large and complex firm is a BHC, other than a LISCC firm, with total consolidated assets of \$250 billion or more; and nonbank assets of \$75 billion or more.

<sup>7</sup> Category II standards apply to covered SLHCs with greater than \$700 billion in assets or \$75 billion in cross-jurisdictional activity. Category III standards apply to covered SLHCs with greater than \$250 billion in assets or greater than \$75 billion in nonbank assets, short-term wholesale funding or off balance-sheet exposure. [See](#) 12 CFR 238.10.

# DRAFT

determine materiality should be measured as of the close of business of the last calendar day of the period, and assets included in a given portfolio are defined in the instructions for each schedule.

BHCs, IHCs, SLHCs also have the option to complete the data schedules for immaterial portfolios. If the BHC or IHC or SLHC does not complete the schedules, the Federal Reserve will assign losses to immaterial portfolios in a manner consistent with the given scenario to produce supervisory estimates

**New Reporters:** New reporters must submit the FRY-14Q PPNR new reports template with data starting as-of 2009 on the first quarter that they are subject to reporting. New reporters must also submit historical data, starting in January 2007, for the FR Y-14Q retail schedules.

## B. Exemptions

BHCs, IHCs and SLHCs 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 the IntraLinks website. 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](mailto:ccar.support@ccar.frb.org).

For requirements regarding the submission of qualitative supporting information, please see the Technical Instructions and Supporting Documentation Instructions, 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 FR Y-14Q schedules monthly or quarterly according to the appropriate time schedule described below. All schedules will be due on or before the end of the submission date (unless that day falls on a weekend or holiday (subject to timely filing provisions)).

Risk Factor Schedules and Sub-Worksheets	Firm Category	Frequency	Data as-of-date	Submission due to Federal Reserve
<b>FR Y-14Q Filings</b>				
<b>Wholesale Risk</b>	Category I-III	Monthly	Last day of each calendar month	<p>For non-quarter end month-ends (e.g., July): By the 30th calendar day after the last day of the preceding calendar month</p> <p>For quarter-end month-ends (e.g., September): Seven days after the FR Y-9C reporting schedule: Reported data (47 days after the calendar quarter-end for March, June, and September and 52 calendar days after the</p>

# DRAFT

				calendar quarter-end for December)
	Category IV	Quarterly	Quarter-end	Seven days after the FR Y-9C reporting schedule: Reported data (47 calendar days after the calendar quarter-end for March, June, and September and 52 calendar days after the calendar quarter-end for December)
<b>Securities</b> <b>PPNR</b> <b>Retail</b> <b>Operational Risk</b> <b>Supplemental</b> <b>Retail FVO/HFS</b> <b>Regulatory Capital</b> <b>Regulatory Capital</b> <b>Instruments</b> <b>Balances</b>	All firms	Quarterly	Quarter-end	Seven days after the FR Y-9C reporting schedule: Reported data (47 calendar days after the calendar quarter-end for March, June, and September and 52 calendar days after the calendar quarter-end for December).
<b>Trading</b> <b>Counterparty</b>	All firms	Quarterly	<p>Fourth Quarter: GMS as-of date for all exposures except Trading FVO Loan Hedges, which should be reported as of calendar quarter-end.</p> <p>All Other: Quarter-end</p>	<p>Fourth Quarter – Trading and Counterparty regular/unstressed submission: 52 calendar days after the notification date (notifying respondents of the as-of-date) or March 15, whichever comes earlier. <b><u>Unless the Board requires the data to be provided over a different weekly period,</u></b> BHCs, SLHCs, and IHCs may provide these data as-of the most recent date that corresponds to their weekly internal risk reporting cycle as long as it falls before the as-of-date.</p>

# DRAFT

				Fourth quarter -- Counterparty stressed GMS submission: April 5 <sup>th</sup>  All other: 47 calendar days after the calendar quarter-end (Seven days after the FR Y-9C reporting schedule).  Upon resubmission of a firm's capital plan – Counterparty stressed GMS submission: as required
--	--	--	--	--

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. 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.

**New Reporters:** Onboarding delays apply to institutions that have not previously submitted the FR Y-14 reports. For the FR Y-14Q schedules, the filing deadline will be extended to (1) 90 days after the quarter-end for the first two monthly or quarterly submissions and (2) 65 days after the quarter-end for the third and fourth monthly or quarterly submissions. Beginning with the fifth monthly or quarterly submission, these respondents will be required to adhere to the standard reporting deadlines above.

## How to Prepare the Reports:

### **A. Applicability of GAAP**

BHCs, IHCs and SLHCs are required to prepare and file the FR Y-14Q schedules in accordance with generally accepted accounting principles (GAAP) and these instructions. The financial records of the BHCs, IHCs and SLHCs should be maintained in such a manner and scope to ensure the FR Y-14Q is prepared in accordance with these instructions and reflects a fair presentation of the BHCs', IHCs' and 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 reports effective September 30, 2019, but would not be fully phased in and reflected on the reporting forms and instructions until the FR Y-14Q report for March 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.



# DRAFT

## C. Technical Details

The following instructions apply generally to the FR Y-14Q schedules, unless otherwise specified. For further information on the technical specifications for this report, 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 monthly or quarterly basis, and not on a cumulative or year-to-date basis.

## D. Other Instructional Guidance

BHCs, IHCs 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 instructions and templates noting associations between the reporting series.

- 1) The FR Y-14A instructions;
- 2) The FR Y-14M instructions;
- 3) 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-14Q schedules, BHCs and IHCs should also consult the most up-to-date CCAR instructions available on the Federal Reserve’s public website.

## E. 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.

## F. Legal Considerations for International Exposures

A BHC or IHC or SLHC is not required to report a particular data item if a foreign law prohibits the BHC or IHC or SLHC from providing the information to the Federal Reserve. However, the Federal Reserve is authorized by law to collect information from a BHC or IHC or SLHC regarding its exposures, including foreign exposures.

A BHC or IHC or SLHC must include with its data submission a legal analysis of the foreign law that prohibits reporting the data to the Federal Reserve. The legal analysis must include, but is not limited to, a detailed description of the law(s) prohibiting the reporting of the information to the Federal Reserve, a summary description of the exposures omitted, any other information the BHC or IHC or SLHC deems relevant to justify omitting the data, and any additional information required by the Federal Reserve.

## 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 Federal Reserve discovers significant errors or omissions subsequent to submission of a report. Failure to file amended reports on a timely basis may

# DRAFT

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](mailto: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 Federal Reserve contact or [info@CCAR.frb.org](mailto:info@CCAR.frb.org) for questions regarding CCAR.

## 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,<sup>8</sup> the Capital Assessments and Stress Testing (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.<sup>9</sup>
- 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.<sup>10</sup> 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. Note that attestations are not required non-quarter end FR Y-14Q submissions.

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.

### **Definition of Commercially Available Credit Bureau Score:**

For the purposes of the FR Y-14Q, a credit score is a numerical value or a categorization derived from a statistical tool or modeling system that characterizes the credit risk of a borrower used by a person who makes or arranges a loan to predict the likelihood of credit default. A credit bureau score is a credit score based solely on the borrower's credit history available through one of the three national credit reporting agencies (Equifax, Experian, and TransUnion).

---

<sup>8</sup> <http://www.federalreserve.gov/bankinforeg/large-institution-supervision.htm>

<sup>9</sup> 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).

<sup>10</sup> 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

A commercially available credit bureau score is a credit bureau score which is available to all commercial lenders. For example, FICO 08 and VantageScore 3.0 are commercially available credit scores, while internally developed credit scores and custom scores tailored to a lender's own portfolio and provided by third parties are not commercially available credit scores.

For a commercially available credit bureau score to qualify for submission in this schedule, the Federal Reserve must be able to obtain sufficient information from the credit score vendor to (a) determine whether the credit score is empirically derived and demonstrably sound (b) evaluate the performance of the credit score and (c) compare that performance to other commercially available credit bureau scores. The Federal Reserve reserves the right to determine whether a credit score qualifies as a commercially available credit bureau score for the purposes of this schedule.

## **Most Recent Capital Framework:**

For all items and instructions related to regulatory capital, particularly where the "most recent capital framework" is referenced, respondents should refer to 12 CFR parts 208, 217, and 225.

# DRAFT

## Schedule A – Retail

### A.1 – International Auto Loan

This section provides general guidance and data definitions for the International Auto Loan Worksheet. In this worksheet, include international auto loans as defined in the FR Y-9C, Schedule HC-C, item 6.c and international auto leases as defined in the FR Y-9C, Schedule HC-C, item 10.a. For Summary Variable line items #10 & #11 include all repossessed international auto loans as defined in the FR Y-9C, Schedule HC-F, item 6. Include only “managed” (securitized or non-securitized) loans, where “managed” refers to loans originated by the BHC or IHC or SLHC, including securitized loans put back on the books due to ASC Topics 860 and 810 (FAS 166/167). Do not include loans that were originated by a third party and only serviced by the BHC or IHC or SLHC. Only include loans and leases held for investment at amortized cost; do not include loans or leases held for sale or held for investment and measured at fair value under the fair value option. For the US Auto Loan Worksheet, see instructions for Worksheet 2.

Segment the portfolio along all combinations of the segment variables listed in Section A below. There are three product type segments, three original industry standard credit score or equivalent segments, six delinquency status segments, and four geography segments; therefore, the portfolio must be divided into a total of  $3*3*6*4 = 216$  distinct segments. Each segment should be identified by a unique eight-digit segment ID (variable name: SEGMENT\_ID) based on the segment ID positions and attribute codes listed in Table A.1.a. For example, the segment containing new auto loans (product type segment “01”) that had an origination FICO score or equivalent of greater than 620 (origination industry standard credit score or equivalent “02”), are 120+ DPD (delinquency status segment “06”), and where the borrowers reside in the Asia Pacific region (geography segment “04”) should be identified by the segment ID “01020604”. When reporting the segment ID, do not drop leading zeroes.

For each month in the required reporting period, report the summary variables listed below in Section B for each of the 216 portfolio segments described above. First time filers must submit all data for each month from January 2007 to the end of the current reporting period; returning filers must submit all data for each month in the current reporting period.

Start each row of data with your BHC or IHC or SLHC name (Variable name: BHC\_NAME), your RSSD ID number (Variable name: RSSD\_ID), the reporting month (Variable name: REPORTING\_MONTH), and the portfolio ID (Variable name: PORTFOLIO\_ID) and segment ID (variable name: SEGMENT\_ID). Use the portfolio ID “IntAuto” for this worksheet. For each row, populate the segment variables listed in Table A.1.a and the summary variables listed in Table A.1.b. Provide all dollar amounts in millions.

Detailed instructions on how to submit the data will be provided separately.

Note: For Summary Variable line items (items 20-23) use the loan level parameters defined in the most recent capital framework for all accounts in a specific segment and calculate the account weighted average. Each month’s parameters need to be calculated specific to that month.

If Basel data are not refreshed monthly, use the appropriate Basel data from the prior quarter. For example, if the Basel data are not refreshed until the third month of a quarter, use the Basel data for the prior quarter for the first two months of the next reporting

# DRAFT

quarter.

## **A. Segment Variables**

Segment the portfolio along the following segment variables as described above. For each resulting segment, report the summary variables described in Section B.

1. **Product type** – Segment the portfolio into the following product types.
  - 01 –New auto loans
  - 02 –Used auto loans
  - 03 –Auto leases
  
2. **Original commercially available credit bureau score or equivalent** – Segment the portfolio by the credit score of the borrower at origination using a commercially available credit bureau score (e.g. FICO Score, VantageScore, or another qualifying credit score). The original credit score used to assign a loan to a segment must be the score upon which the original underwriting decision was based. If the underwriting decision was based on an internal score, please map this score to an industry standard credit score. Please provide supporting documentation listing the credit score supplied or mapped to.

The ranges below should be used for loans for which FICO was either the original credit score used at origination or the commercially available credit bureau score to which an internal credit score was mapped. Ranges for other commercially available credit bureau scores will be provided upon request.

01 - <=620

02 - >620

03 - N/A – Original credit score is missing or unknown

3. **Delinquency status** - Segment the portfolio into the following six delinquency statuses:
  - 01 - Current: Accounts that are not past due (accruing and non-accruing) as of month-end.
  - 02 - 1-29 days past due (DPD): Accounts that are 1 to 29 days past due (accruing and non-accruing) as of month-end.
  - 03 - 30-59 DPD: Accounts that are 30 to 59 days past due (accruing and non-accruing) as of month-end.
  - 04 - 60-89 DPD: Accounts that are 60 to 89 days past due (accruing and non-accruing) as of month-end.
  - 05 - 90-119 DPD: Accounts that are 90 to 119 days past due (accruing and non-accruing) as of month-end.
  - 06 - 120+ DPD: Accounts that are 120 or more days past due (accruing and non-accruing) as of month-end.
  
4. **Geography** –Segment the portfolio into the following four geographical area designations. The borrower’s current place of residency should be used to define the region.
  - 01 - Canada
  - 02 - EMEA—Europe, Middle East, and Africa
  - 03 - LATAM—Latin America and Caribbean
  - 04 - APAC—Asia Pacific

# DRAFT

## **B. Summary Variables**

For each month in the reporting period, report the following summary variables for each segment described in Section A.

When reporting \$ Vehicle Type (lines 5-8), vehicles should be classified for the purpose of this schedule by body style; however, a luxury vehicle may include all body styles that meet the qualification of a high cost vehicle that aspires to provide drivers with the peak of driving comfort and performance. A luxury vehicle may be manufactured by a conventional automobile manufacturer but still be considered a luxury vehicle if it meets the standards of high price as compared to conventional vehicles and peak driving performance and comfort.

1. **# Accounts** – Total number of accounts on the book for the segment as of month-end.
2. **\$ Outstandings** – Total unpaid principal balance for accounts on the book for the segment reported as of month-end.
3. **# New accounts** – The total number of new accounts originated (or purchased) in the given month for the segment as of month-end.
4. **\$ New accounts** – The total dollar amount of new accounts originated (or purchased) in the given month for the segment as of month-end.
5. **\$ Vehicle type car/van** – The unpaid principal balance in the portfolio with vehicle type classified as “car/van” for the segment as of month-end.
6. **\$ Vehicle type SUV/truck** – The unpaid principal balance in the portfolio with vehicle type classified as “SUV/truck” for the segment as of month-end.
7. **\$ Vehicle type sport/luxury/convertible** – The unpaid principal balance in the portfolio with vehicle type classified as “sport/luxury/convertible” for the segment as of month-end.
8. **\$ Vehicle type unknown** – The unpaid principal balance in the portfolio with vehicle type classified as “unknown” for the segment as of month-end.
9. **\$ Repossession** – The unpaid principal balance of loans still on the books whose vehicles have been repossessed for the segment as of month-end. This field captures the stock of repos.
10. **\$ Current month repossession** – The unpaid principal balance of loans still on the books whose vehicles were newly repossessed in the given month for the segment as of month-end. This field captures the flow of repos in the current month, and should include both active and charged-off loans.
11. **\$ Gross contractual charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off during the reporting month, except where the charge-off arises from the bankruptcy of the borrower (see the variable \$ Bankruptcy Charge-offs). The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Charge-offs should be performed per loss recognition policy consistent with the FFIEC Uniform Retail Credit

# DRAFT

## Classification and Account Management Policy.

12. **\$ Bankruptcy charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off due to bankruptcy during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
13. **\$ Recoveries** – The dollar amount recovered during the reporting month on loans in the segment that were previously charged-off, including recoveries on acquired loans/portfolios. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column B of the FR Y-9C for the corresponding time period. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Reversals of recoveries should be recorded as negative recoveries.
14. **\$ Net charge-offs** – The dollar amount of write-downs net on loans in the segment that were charged-off during the reporting month, net of any recoveries in the reporting month on loans in the segment that were previously charged-off. Generally, \$ Net Charge-offs should equal [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ].
15. **Adjustment factor to reconcile \$ gross contractual charge-offs to \$ net charge-offs**  
If it is not the case that \$ net charge-offs equals [ $\$ \text{gross contractual charge-offs} + \$ \text{bankruptcy charge-offs} - \$ \text{recoveries}$ ], provide the value of \$ net charge-offs minus [ $\$ \text{gross contractual charge-offs} + \$ \text{bankruptcy charge-offs} - \$ \text{recoveries}$ ] in this variable. As a separate document included in the submission, provide an explanation for such a difference (for example, fraud losses are also include in the BHC's or IHC's or SLHC's \$ net charge-offs variable). If the adjustment factor variable represents more than one factor leading to the difference, provide a separate breakout of the multiple factors.
16. **\$ Ever 30DPD in the last 12 months** – The total unpaid principal balance for the segment as of month-end that was 30 or more days past due at any given time in the twelve months ending in the reference month.
17. **\$ Ever 60DPD in the last 12 months** – The total unpaid principal balance for the segment as of month-end that was 60 or more days past due at any given time in the twelve months ending in the reference month.
18. **Projected value** – Total projected value of lease at termination. Only calculated for leased vehicles.
19. **Actual sale proceeds** – Sales proceeds from terminated leases. Only calculated for leased vehicles.
20. **Probability of Default (PD)** - Report the average Probability of Default (PD) as defined in the most recent capital framework for accounts within the segment. More specifically, use the PD associated with each account's corresponding segment and then calculate the account weighted average PD of all the accounts in this specific Y-14Q segment. Note: Applicable only to the advanced approaches reporting banks. A one in ten probability of default should be reported as 0.1.

# DRAFT

21. **Loss Given Default (LGD)** - Report the Loss Given Default (LGD) as defined in the most recent capital framework for accounts within the segment. More specifically, use the LGD associated with each account's corresponding segment and then calculate the account weighted average LGD of all the accounts in this specific Y-14Q segment. Note: Applicable only to the advanced approaches reporting banks. A ninety percent loss given default should be reported as 0.9.
22. **Expected Loss Given Default (ELGD)** - Report the Expected Loss Given Default (ELGD) as defined in the most recent capital framework parameter for accounts within the segment. More specifically, use the ELGD associated with each account's corresponding segment and then calculate the account weighted average ELGD of all the accounts in this specific Y-14Q segment. Missing or unavailable values should be reported as null. Note: Applicable only to the advanced approaches reporting banks. A ninety percent expected loss given default should be reported as 0.9.
23. **Risk-Weighted Asset (RWA)** - Report the aggregate dollar Risk Weighted Asset (RWA) for accounts within the segment as defined in the most recent capital framework. More specifically, calculate the RWA associated with each account based on the IRB Risk-Based Capital Formula and then calculate the account weighted average RWA of all the accounts in this specific Y-14Q segment. Note: Applicable only to banks subject to the advanced approaches rule. This item is required for BHC or IHC or SLHC-owned loans only.
24. **Weighted Average Life of Loans** - The Weighted Average Life of Loans 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 as of month-end. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in the segment, rounded to the nearest monthly term.



# DRAFT

## A.2 - US Auto Loan

This section provides general guidance and data definitions for the US Auto Loan Worksheet. For the International Auto Loan Worksheet, see the instructions for Worksheet 1. In this worksheet, include all domestic auto loans as defined in the FR Y-9C, Schedule HC-C, item 6.c and domestic auto leases as defined in the FR Y-9C, Schedule HC-C, item 10.a. For Summary Variable line items 10 & 11 include all repossessed auto loans as defined in the FR Y-9C, Schedule HC-F, item 6. Include only “managed” (securitized or non-securitized) loans, where “managed” refers to loans originated by the BHC or IHC or SLHC, including securitized loans put back on the books due to FAS 166/167 (ASC Topics 860 and 810). Do not include loans that were originated by a third party and only serviced by the BHC or IHC or SLHC. Only include loans and leases held for investment at amortized cost; do not include loans or leases held for sale or held for investment and measured at fair value under the fair value option.

Segment the portfolio along all combinations of the segment variables listed in Section A below. There are three product type segments, six age segments, four original LTV segments, six original industry standard credit score or equivalent segments, six geography segments, and five delinquency status segments; therefore, the portfolio must be divided into a total of  $3*6*4*6*6*5 = 12,960$  distinct segments. Each segment should be identified by a unique twelve-digit segment ID (variable name: SEGMENT\_ID) based on the segment ID positions and attribute codes listed in Table A.2.a. For example, the segment containing new auto loans (product type segment “01”) that are greater than five years old (age segment “01”), had an origination LTV of greater than 120 (original LTV segment “03”), had an origination FICO score or equivalent of greater than 720 (original industry standard credit score or equivalent segment “04”), where the borrowers reside in Region 3 (geography segment “03”), and that are 120+ DPD (delinquency status segment “05”) should be identified by the segment ID “010103040305”. When reporting the segment ID, do not drop leading zeroes.

For each month in the required reporting period, report the summary variables listed below in Section B for each of the 10,800 portfolio segments described above. First time filers must submit all data for each month from January 2007 to the end of the current reporting period; returning filers must submit all data for each month in the current reporting period.

Start each row of data with your BHC or IHC or SLHC name (Variable name: BHC\_NAME), your RSSD ID number (Variable name: RSSD\_ID), the reporting month (Variable name: REPORTING\_MONTH), and the portfolio ID (Variable name: PORTFOLIO\_ID). Use the portfolio ID “Auto” for your Portfolio ID within this worksheet. For each row, populate the segment variables listed in Table A.2.a and the summary variables listed in Table A.2.b. Provide all dollar amounts in millions.

Detailed instructions on how to submit the data will be provided separately.

Note: For Summary Variable line items (items 28-31) related to the most recent capital framework use the loan level parameters for all accounts in a specific segment and calculate the account weighted average. Each month’s parameters need to be calculated specific to that month.

If Basel data are not refreshed monthly, use the appropriate Basel data from the prior quarter. For example, if the Basel data are not refreshed until the third month of a quarter, use the Basel data for the prior quarter for the first two months of the next reporting quarter.

# DRAFT

## A. Segment Variables

Segment the portfolio along the following segment variables as described above. For each resulting segment, report the summary variables described in Section B.

1. **Product type** - Segment the portfolio into the following product types:
  - 01 -New auto loans
  - 02 -Used auto loans
  - 03 -Auto leases
  
2. **Age** - Refers to the time that has elapsed since the loan was originated. If there were multiple disbursements tied to an original then use the time since the first disbursement. There are six possible ages to report:
  - 01 - 5 years  $\leq$  Age
  - 02 - 4 years  $\leq$  Age  $<$  5 years
  - 03 - 3 years  $\leq$  Age  $<$  4 years
  - 04 - 2 years  $\leq$  Age  $<$  3 years
  - 05 - 1 year  $\leq$  Age  $<$  2 years
  - 06 - Age  $<$  1 year
  
3. **Original LTV** - Segment the portfolio into the loan to value ratio at origination (calculated using the wholesale price of the vehicle). Please round any LTV ratios up to the next integer (LTV 90.01-90.99 to 91). Please break into the following segments:
  - 01 -  $\leq$  90
  - 02 - 91 - 120
  - 03 -  $>$  120
  - 04 - N/A - Original LTV is missing or unknown
  
4. **Original commercially available credit bureau score or equivalent** - Segment the portfolio by the credit score of the borrower at origination using a commercially available credit bureau score (e.g. FICO Score, VantageScore, or another qualifying credit score). The original credit score used to assign a loan to a segment must be the score upon which the original underwriting decision was based. If the underwriting decision was based on an internal score, please map this score to an industry standard credit score. Please provide supporting documentation listing the credit score supplied or mapped to.

The ranges below should be used for loans for which FICO was either the original credit score used at origination or the commercially available credit bureau score to which an internal credit score was mapped. Ranges for other commercially available credit bureau scores will be provided upon request.

  - 00 -  $\leq$ 560
  - 01 -  $>$ 560 and  $\leq$  620
  - 02 -  $>$  620 and  $\leq$  660
  - 03 -  $>$  660 and  $\leq$  720
  - 04 -  $>$  720
  - 05 - N/A — Original credit score is missing or unknown
  
5. **Geography** - Segment the portfolio into the following six geographical area designations. The primary borrower's current place of residence should be used to define the region.
  - 01 - Region 1: California, Nevada, Florida, Arizona
  - 02 - Region 2: Rhode Island, South Carolina, Oregon, Michigan, Indiana, Kentucky, Georgia, Ohio, Illinois
  - 03 - Region 3: Washington D.C., Mississippi, North Carolina, New Jersey, Tennessee,

# DRAFT

- Missouri, West Virginia, Connecticut, Idaho, Pennsylvania, Washington, Alabama  
04 - Region 4: Delaware, Massachusetts, New York, Colorado, New Mexico, Texas  
05 - Region 5: Alaska, Louisiana, Wisconsin, Arkansas, Maine, Maryland, Utah, Montana,  
Minnesota, Oklahoma, Iowa, Virginia, Wyoming, Kansas, Hawaii  
06 - Region 6: Vermont, New Hampshire, Nebraska, South Dakota, North Dakota

6. **Delinquency status** - Segment the portfolio into the following five delinquency statuses:
- 01 - Current + 1-29 DPD: Accounts that are not past due (accruing and non-accruing) or are 1-29 DPD (accruing and non-accruing) as of month-end.
  - 02 - 30-59 DPD: Accounts that are 30 to 59 days past due (accruing and non-accruing) as of month-end.
  - 03 - 60-89 DPD: Accounts that are 60 to 89 days past due (accruing and non-accruing) as of month-end.
  - 04 - 90-119 DPD: Accounts that are 90 to 119 days past due (accruing and non-accruing) as of month-end.
  - 05 - 120+ DPD: Accounts that are 120 or more days past due (accruing and non-accruing) as of month-end.

## B. Summary Variables

For each month in the reporting period, report the following summary variables for each segment described in Section A.

When reporting \$ Vehicle Type (lines 6-9), vehicles should be classified for the purpose of this schedule by body style; however, a luxury vehicle may include all body styles that meet the qualification of a high cost vehicle that aspires to provide drivers with the peak of driving comfort and performance. A luxury vehicle may be manufactured by a conventional automobile manufacturer but still be considered a luxury vehicle if it meets the standards of high price as compared to conventional vehicles and peak driving performance and comfort.

1. **# Accounts** – Total number of accounts on the book for the segment as of month-end.
2. **\$ Outstandings** – Total unpaid principal balance for accounts on the book for the segment as of month-end.
3. **# New accounts** – The total number of new accounts originated (or purchased) in the given month for the segment as of month-end. The BHC or IHC or SLHC should follow its standard practice for assigning date of origination.
4. **\$ New accounts** – The total dollar amount of new accounts originated (or purchased) in the given month for the segment as of month-end. The BHC or IHC or SLHC should follow its standard practice for assigning date of origination.
5. **Interest rate** – The average annual percentage rate for accounts on the book for the segment as of month-end. In making this calculation, report the purchase APR unless the account is in default or workout. If the account is in default, then use the default APR. If the account is in a workout program (temporary or permanent), use the workout APR. Workout programs are programs to alleviate the temporary payment burden of the borrowers so that they don't go into default. Loan Modification (a permanent change in one or more of the terms of a Borrower's loan, allows the loan to be reinstated, and results in a payment the Borrower can afford), loss mitigation, and loan re-negotiation are some examples of workout programs.

# DRAFT

6. **\$ Vehicle type car/van** – The unpaid principal balance in the portfolio with vehicle type classified as “Car/Van” for the segment as of month-end.
7. **\$ Vehicle type SUV/truck** – The unpaid principal balance in the portfolio with vehicle type classified as “SUV/Truck” for the segment as of month-end.
8. **\$ Vehicle type sport/luxury/convertible** – The unpaid principal balance in the portfolio with vehicle type classified as “Sport/Luxury/Convertible” for the segment as of month-end.
9. **\$ Vehicle type unknown** – The unpaid principal balance in the portfolio with vehicle type classified as “Unknown” for the segment as of month-end.
10. **\$ Repossession** – The unpaid principal balance of loans still on the books whose vehicles have been repossessed for the segment as of month-end. This field captures the stock of repos.
11. **\$ Current Month Repossession** – The unpaid principal balance of loans still on the books whose vehicles were newly repossessed in the given month for the segment as of month-end. This field captures the flow of repos in the current month, and should include both active and charged-off loans.
12. **\$ Gross contractual charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off during the reporting month, except where the charge-off arises from the bankruptcy of the borrower (see the variable \$ Bankruptcy Charge-offs). The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Charge-offs should be performed per loss recognition policy consistent with the FFIEC Uniform Retail Credit Classification and Account Management Policy.
13. **\$ Bankruptcy charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off due to bankruptcy during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
14. **\$ Recoveries** – The dollar amount recovered during the reporting month on loans in the segment that were previously charged-off, including recoveries on acquired loans/portfolios. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column B of the FR Y-9C for the corresponding time period. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Reversals of recoveries should be recorded as negative recoveries.
15. **\$ Net charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off during the reporting month, net of any recoveries in the reporting month on loans in the segment that were previously charged-off. Generally, \$ Net Charge-offs should equal [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ].
16. **Adjustment factor to reconcile \$ gross contractual charge-offs to \$ net charge-offs**  
– If it is not the case that \$ Net Charge-offs equals [ $\$ \text{Gross Contractual Charge-offs} + \$$

# DRAFT

Bankruptcy Charge-offs - \$ Recoveries], provide the value of \$ Net Charge-offs minus [\$ Gross Contractual Charge-offs + \$ Bankruptcy Charge-offs - \$ Recoveries] in this variable. As a separate document included in your submission, provide an explanation for such a difference (for example, fraud losses are also included in your BHC's or IHC's or SLHC's \$ Net Charge-offs variable). If the adjustment factor variable represents more than one factor leading to the difference, provide a separate breakout of the multiple factors.

17. **\$ Ever 30DPD in the last 12 months** – The total unpaid principal balance for the segment as of month-end that was 30 or more days past due at any given time in the twelve months ending in the reference month.
18. **\$ Ever 60DPD in the last 12 months** – The total Unpaid Principal Balance for the segment as of month-end that was 60 or more days past due at any given time in the twelve months ending in the reference month.
19. **Projected value** – Total projected market value of lease at termination. Only calculated for leased vehicles.
20. **Actual sale proceeds** – Sales proceeds from terminated leases. Only calculated for leased vehicles.
21. **Original term <= 48 months** – The total unpaid principal balance for accounts on the book for the segment as of month-end that had an original term of 48 months or less.
22. **Original term 49-60 months** – The total unpaid principal balance for accounts on the book for the segment as of month-end that had an original term of 49-60 months.
23. **Original term 61-72 months** – The total unpaid principal balance for accounts on the book for the segment as of month-end that had an original term of 61-72 months.
24. **Original term >72 months** – The total unpaid principal balance for accounts on the book for the segment as of month-end that had an original term of greater than 72 months.
25. **\$ Origination channel (direct)** – The total unpaid principal balance for accounts on the book for the segment as of month-end that were originated through direct channels (i.e., a chartered bank, a non- bank subsidiary).
26. **\$ Loss mitigation** – The total unpaid principal balance for accounts on the book for the segment as of month-end that are currently in a loss mitigation program. Loss mitigation programs are broadly defined to include any program that eases the credit terms to an impaired borrower for purposes of mitigating loan losses. Examples of loss mitigation programs include match pay, temporary mitigation programs lasting up to 12 months or permanent mitigation programs lasting more than one year.
27. **\$ Joint application** – The total unpaid principal balance for accounts on the book for the segment as of month-end that were originated with a co-applicant.
28. **Probability of Default (PD)** - Report the average Probability of Default (PD) as defined in the most recent capital framework for accounts within the segment. More specifically, use the PD associated with each account's corresponding segment and then calculate the account weighted average PD of all the accounts in this specific Y-14Q segment. Note:

# DRAFT

Applicable only to the advanced approaches reporting banks. A one in ten probability of default should be reported as 0.1.

29. **Loss Given Default (LGD)** - Report the Loss Given Default (LGD) as defined in the most recent capital framework for accounts within the segment. More specifically, use the LGD associated with each account's corresponding segment and then calculate the account weighted average LGD of all the accounts in this specific Y-14Q segment. Note: Applicable only to the advanced approaches reporting banks. A ninety percent loss given default should be reported as 0.9.
  30. **Expected Loss Given Default (ELGD)** - Report the Expected Loss Given Default (ELGD) parameter as defined in the most recent capital framework for accounts within the segment. More specifically, use the ELGD associated with each account's corresponding segment and then calculate the account weighted average ELGD of all the accounts in this specific Y-14Q segment. Missing or unavailable values should be reported as null. Note: Applicable only to the advanced approaches reporting banks. A ninety percent expected loss given default should be reported as 0.9.
  31. **Risk-Weighted Asset (RWA)** - Report the aggregate dollar Risk Weighted Asset (RWA) for accounts within the segment as defined in the most recent capital framework. More specifically, calculate the RWA associated with each account based on the IRB Risk-Based Capital Formula and then calculate the account weighted average RWA of all the accounts in this specific Y-14Q segment. Note: Applicable only to banks subject to the advanced approaches rule. This item is required for BHC or IHC or SLHC-owned loans only.
  32. **\$ Unpaid Principal Balance at Charge-off** – The total unpaid principal balance of loans in the segment that were charged-off (either partially or fully) during the reporting month and had not been partially charged-off in a prior reporting month. Report the unpaid principal balance at the time of the charge-off. Do not include interest and fees. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
  33. **Percent Loss Severity (3 month Lagged)** – Report the total loss net of all recoveries as a percent of the unpaid principal balance (UPB) for all accounts in the segment that were charged-off for the first time in the third month prior to the current reporting month. Do not include losses or recoveries on loans charged-off for the first time in later months. For the Delinquency Status segment, categorize loans by their delinquency status at the initial charge-off.
  34. **Weighted Average Life of Loans** – The Weighted Average Life of Loans 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 as of month-end. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in the segment, rounded to the nearest monthly term.
-

# DRAFT

## A.3 - International Credit Card

This section provides general guidance, data definitions and instructions for the International Card Worksheet. In this worksheet, include all international consumer credit and charge card loans as defined in the FR Y-9C, Schedule HC-C, items 6.a and 6.d. international corporate and SME card loans as defined in the FR Y-9C, Schedule HC-C, item 4.b. Only include loans and leases held for investment at amortized cost; do not include loans or leases held for sale or held for investment and measured at fair value under the fair value option.

Segment the portfolio along all combinations of the segment variables listed in Section A below. There are three product type segments, two age segments, four geography segments, five delinquency status segments, and three original industry standard credit score or equivalent segments; therefore, the portfolio must be divided into a total of  $3*2*4*5*3 = 360$  distinct segments. Each segment should be identified by a unique ten-digit segment ID (variable name: SEGMENT\_ID) based on the segment ID positions and attribute codes listed in Table A.3.a. For example, the segment containing bank cards (product type segment "01") that are greater than two years old (age segment "02"), made to borrowers residing in the Asia Pacific region (geography segment "04"), are 120+ DPD (delinquency status segment "05"), and had an original FICO score or equivalent of greater than 620 (original industry standard credit score or equivalent segment "02") should be identified by the segment ID "0102040502". When reporting the segment ID, do not drop leading zeroes.

For each month in the required reporting period, report the summary variables listed below in Section B for each of the 360 portfolio segments described above. First time filers must submit all data for each month from January 2007 to the end of the current reporting period; returning filers must submit all data for each month in the current reporting period.

Start each row of data with your BHC or IHC or SLHC name (Variable name: BHC\_NAME), your RSSD ID number (Variable name: RSSD\_ID), the reporting month (Variable name: REPORTING\_MONTH), the portfolio ID (Variable name: PORTFOLIO\_ID) and segment ID (variable name: SEGMENT\_ID). Use the portfolio ID "IntCard" for this worksheet. For each row, populate the segment variables listed in Table A.3.a and the summary variables listed in Table A.3.b. Please provide all dollar amounts in millions.

Detailed instructions on how to submit the data will be provided separately.

### **A. Segment Variables**

Segment the portfolio along the following segment variables as described above. For each resulting segment, report the summary variables described in Section B.

- 1. Product type** – Segment the portfolio into the following three product types:
  - 01 - Bank Card** - Bank cards are regular general purpose 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 and co-brand cards in this category, and student cards if applicable. This product type also includes private label or propriety credit cards, which are 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.
  - 02 - Charge Card** - Charge cards are consumer credit cards for which the balance is repaid in full each billing cycle.
  - 03 - Corporate, SME, and Business cards** - Corporate cards are employer-sponsored credit cards for use by a company's employees and SME and Business cards are credit card accounts where the loan is underwritten with the sole proprietor or

# DRAFT

primary business owner as an applicant. Corporate, SME and Business cards only include cards where there is any individual liability associated with the sub-lines or the account is delinquency managed or scored. Also include cards where the account is delinquency managed or scored and performance is reported to the credit bureaus; corporate and SME cards do not include loans for which a commercially-graded corporation is ultimately responsible for repayment of credit losses with no reporting to credit bureaus.

2. **Age** – Age refers to the amount of time that has elapsed since the account was originated. There are two possible ages to report:  
01 - <= Two years old  
02 - > Two years old
  
3. **Geography** – Segment the portfolio into the following four geographical area designations. The primary borrower’s current place of residency should be used to define the region.  
01 - Region 1: Canada  
02 - Region 2: EMEA — Europe, Middle East, and Africa  
03 - Region 3: LATAM — Latin America and Caribbean  
04 - Region 4: APAC — Asia Pacific
  
4. **Delinquency status** – Segment the portfolio into the following five delinquency statuses:  
01 - Current and 1 - 29 days past due (DPD): Accounts that are not past due (accruing and non-accruing) as of month-end and accounts that are 1 to 29 days past due (accruing and non-accruing) as of month-end.  
02 - 30 - 59 DPD: Accounts that are 30 to 59 days past due (accruing and non-accruing) as of month-end.  
03 - 60 - 89 DPD: Accounts that are 60 to 89 days past due (accruing and non-accruing) as of month-end.  
04 - 90 - 119 DPD: Accounts that are 90 to 119 days past due (accruing and non-accruing) as of month-end.  
05 - 120+ DPD: Accounts that are 120 or more days past due (accruing and non-accruing) as of month-end.
  
5. **Original commercially available credit bureau score or equivalent** – Segment the portfolio by the credit score of the borrower at origination using a commercially available credit bureau score (e.g. FICO Score, VantageScore, or another qualifying credit score). The original credit score used to assign a loan to a segment must be the score upon which the original underwriting decision was based. If the underwriting decision was based on an internal score, please map this score to an industry standard credit score. Please provide supporting documentation listing the credit score supplied or mapped to.

The ranges below should be used for loans for which FICO was either the original credit score used at origination or the commercially available credit bureau score to which an internal credit score was mapped. Ranges for other commercially available credit bureau scores will be provided upon request.

- 01 - <= 620
- 02 - > 620
- 03 - N/A – Original credit score is missing or unknown



# DRAFT

## B. Summary Variables

For each month in the reporting period, report the following summary variables for each segment described in Section A.

1. **# Accounts** – Total number of accounts on the book for the segment as of month-end.
2. **\$ Receivables** – Total receivables for accounts on the book for the segment as of month-end.
3. **\$ Unpaid principal balance** – Total Unpaid Principal Balance (UPB) on the book for the segment as of month-end. Unlike receivables, total UPB should be net of any interest and fees owed by the borrower.
4. **\$ Commitments** – The total dollar amount of credit lines on the book for the segment as of month-end (include drawn and undrawn credit lines). The internal automated limit (shadow limit) should be used when there is no contractual limit.
5. **# New accounts** – The total number of new accounts originated (or purchased) in the given month for the segment as of month-end.
6. **\$ New commitments** – The total dollar amount of new commitments on accounts originated (or purchased) in the given month for the segment as of month-end. If unknown for some accounts due to an acquisition or a merger, report the credit line at acquisition.
7. **\$ Gross contractual charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off during the reporting month, except where the charge-off arises from the bankruptcy of the borrower (see the variable \$ Bankruptcy Charge-offs). Also include write-downs to fair value on loans transferred to the held-for-sale account during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
8. **\$ Bankruptcy charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off due to bankruptcy during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
9. **\$ Recoveries** – The dollar amount recovered during the reporting month on loans in the segment that were previously charged-off. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column B of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Reversals of recoveries should be recorded as negative recoveries.
10. **# Accounts charged-off** – The total number of accounts which experienced a charge-off (contractual or bankruptcy) in the reference month. For the delinquency status segmentation, categorize charge-offs by delinquency status at charge-off.
11. **\$ Net charge-offs** – The dollar amount of write-downs net on loans in the segment that were charged-off during the reporting month, net of any recoveries in the reporting

# DRAFT

month on loans in the segment that were previously charged-off. Generally, \$ Net Charge-offs should equal [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ].

12. **Adjustment factor to reconcile \$ gross contractual charge-offs to \$ net charge-offs** – If it is not the case that \$ Net Charge-offs equals [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ], provide the value of \$ Net Charge-offs minus [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ] in this variable, and separately provide an explanation for the difference. In a separate document included in the submission, provide an explanation for such a difference (for example, fraud losses are also included in the reporting BHC's or IHC's or SLHC's \$ Net Charge-offs variable). If the adjustment factor variable represents more than one factor leading to the difference, provide a separate breakout of the multiple factors.
  13. **\$ O/S for accounts that were 30+ DPD in last 24 months** – The total receivables for the segment as of month-end that was 30 or more days past due at any given time in the past 24 months ending in the reference month. Exclude charged-off accounts when making this calculation.
  14. **# Accounts that were 30+ DPD in last 24 months** – The total number of accounts for the segment as of month-end that were 30 or more days past due at any given time in the past 24 months ending in the reference month. Exclude charged-off accounts when making this calculation.
  15. **Weighted Average Life of Loans** – The Weighted Average Life of Loans 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 as of month-end. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in the segment, rounded to the nearest monthly term.
-

# DRAFT

## A.4 - International Home Equity

This section provides general guidance and data definitions for the International Home Equity Worksheet. In this worksheet, include all international home equity loans secured by real estate as defined in the FR Y-9C, Schedule HC-C, item 1, that meet the loan criteria of item 1.c.1 and 1.c.2.b. Note that this includes international first lien and second lien home equity lines. Only include loans and leases held for investment at amortized cost; do not include loans or leases held for sale or held for investment and measured at fair value under the fair value option. For international first lien mortgages, see instructions for Worksheet 5.

Segment the portfolio along all combinations of the segment variables listed in Section A below. There are two product type segments, three origination industry standard credit score or equivalent segments, four geography segments, two age segments, two origination LTV segments, and five delinquency status segments; therefore, the portfolio must be divided into a total of  $2*3*4*2*2*5 = 480$  distinct segments. Each segment should be identified by a unique twelve-digit segment ID (variable name: SEGMENT\_ID) based on the segment ID positions and attribute codes listed in Table A.4.a. For example, the segment containing HELOCs (product type segment "02") that had an origination FICO score or equivalent of greater than 660 (original industry standard credit score or equivalent segment "02"), where the borrowers reside in the Asia Pacific region (geography segment "04"), are greater than three years old (age segment "02"), had an origination LTV of less than 80 percent (original LTV segment "01"), and are 180+ DPD (delinquency status segment "05") should be identified by the segment ID "020204020105". When reporting the segment ID, do not drop leading zeroes.

For each month in the required reporting period, report the summary variables listed below in Section B for each of the 480 portfolio segments. First time filers must submit all data for each month from January 2007 to the end of the current reporting period; returning filers must submit all data for each month in the current reporting period only. BHCs, IHCs and SLHCs should only include owned loans, exclude loans serviced for other investors.

Start each row of data with your BHC or IHC or SLHC name (Variable name: BHC\_NAME), your RSSD ID number (Variable name: RSSD\_ID), the reporting month (Variable name: REPORTING\_MONTH), the portfolio ID (Variable name: PORTFOLIO\_ID) and segment ID (variable name: SEGMENT\_ID). Use the portfolio ID "IntHE" for this worksheet. For each row, populate the segment variables listed in Table A.4.a and the summary variables listed in Table A.4.b. Please provide all dollar amounts in millions.

Detailed instructions on how to submit the data will be provided separately.

### **A. Segment Variables**

Segment the portfolio along the following segment variables as described above. For each resulting segment, report the summary variables described in Section B.

- 1. Product type** – Segment the portfolio into product types based on specific features of the loan. The portfolio should be segmented into two product types:  
01 - HELOAN  
02 - HELOC
- 2. Original commercially available credit bureau score or equivalent** – Segment the portfolio by the credit score of the borrower at origination using a commercially available credit bureau score (e.g. FICO Score, VantageScore, or another qualifying credit score). The original credit score used to assign a loan to a segment must

# DRAFT

be the score upon which the original underwriting decision was based. If the underwriting decision was based on an internal score, please map this score to an industry standard credit score. Please provide supporting documentation listing the credit score supplied or mapped to.

The ranges below should be used for loans for which FICO was either the original credit score used at origination or the commercially available credit bureau score to which an internal credit score was mapped. Ranges for other commercially available credit bureau scores will be provided upon request.

01 -  $\leq 660$

02 -  $> 660$

03 - N/A—Original credit score is missing or unknown

3. **Geography** – Report the region in which the property is located; divide the portfolio into the following four geographical area designations:
  - 01 - Region 1: Canada
  - 02 - Region 2: EMEA—Europe, Middle East, and Africa
  - 03 - Region 3: LATAM—Latin America and Caribbean
  - 04 - Region 4: APAC—Asia-Pacific
4. **Age** – Age refers to the amount of time that has elapsed since the account was originated. There are two possible ages to report:
  - 01 -  $\leq$  Three years old
  - 02 -  $>$  Three years old
5. **Original LTV (or CLTV for 2nds)** – The original combined loan-to-value ratio is the original amount of the loan or line, in addition to any senior liens, divided by the property value at the time of origination. Divide the portfolio as follows:
  - 01 -  $< 80$
  - 02 -  $\geq 80$
6. **Delinquency status** – Divide the portfolio into the following five delinquency statuses:
  - 01 - Current & 1-29 days past due (DPD): Accounts that are not past due (accruing and non-accruing) or are 1-29 DPD (accruing and non-accruing) as of month-end.
  - 02 - 30-89 DPD: Accounts that are 30 to 89 days past due (accruing and non-accruing) as of month-end.
  - 03 - 90-119 DPD: Accounts that are 90 to 119 days past due (accruing and non-accruing) as of month-end.
  - 04 - 120-179 DPD: Accounts that are 120 to 179 days past due (accruing and non-accruing) as of month-end.
  - 05 - 180+ DPD: Accounts that are 180 or more days past due (accruing and non-accruing) as of month-end.

## **B. Summary Variables**

For each month in the reporting period, report the following summary variables for each segment described in Section A.

1. **# Accounts** – Total number of accounts on the book for the segment as of month-end.
2. **\$ Outstandings** – Total principal amount outstanding as of the end of the month. This should be reported as unpaid principal balance (UPB) gross of any charge-offs. In other words, the \$ outstanding should not reflect any accounting based write-downs and should only be reduced to zero when the loan has been liquidated – either paid in full, charged off, or other real estate owned (OREO) sold.

# DRAFT

3. **\$ Commitment (HELOC only)** – The total dollar amount of HELOC credit lines on the book for the segment as of month-end. If there is no credit limit on certain accounts, report the purchase or shadow limit. A shadow limit is defined as an internal BHC or IHC or SLHC credit limit metric used for line management for lines that do not have a published credit limit. Report this variable only for HELOC products.
4. **# New accounts** – The total number of new accounts originated (or purchased) in the given month for the segment as of month-end.
5. **\$ New accounts** – The total dollar amount of new accounts originated (or purchased) in the given month for the segment as of month-end.
6. **\$ New commitments (HELOC only)** – The total dollar amount of new HELOC credit lines booked on the system in the reporting month. Report this variable only for HELOC products.
7. **\$ Commitment increases (HELOC only)** – The dollar amount increase on existing HELOC credit lines in the reporting-month. Report this variable only for HELOC products.
8. **\$ Commitment decreases (HELOC only)** – The dollar amount decrease on existing HELOC credit lines in the reporting-month. Report this variable only for HELOC products.
9. **\$ Gross contractual charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off during the reporting month, except where the charge-off arises from the bankruptcy of the borrower (see the variable \$ Bankruptcy Charge-offs). Also include write-downs to fair value on loans transferred to the held-for-sale account during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
10. **\$ Bankruptcy charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off due to bankruptcy during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
11. **\$ Recoveries** – The dollar amount recovered during the reporting month on loans in the segment that were previously charged-off. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column B of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Reversals of recoveries should be recorded as negative recoveries.
12. **\$ Net charge-offs** – The dollar amount of write-downs net on loans in the segment that were charged-off during the reporting month, net of any recoveries in the reporting month on loans in the segment that were previously charged-off. Generally, \$ Net Charge-offs should equal [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ].
13. **Adjustment factor to reconcile \$ gross contractual charge-offs to \$ net charge-offs**  
– If it is not the case that  $\$ \text{Net Charge-offs}$  equals [ $\$ \text{Gross Contractual Charge-offs} + \$$

# DRAFT

*Bankruptcy Charge-offs — \$ Recoveries*], provide the value of *\$ Net Contractual Charge-offs* minus [*\$ Gross Contractual Charge-offs + \$ Bankruptcy Charge-offs — \$ Recoveries*] in this variable. As a separate document included in the submission, provide an explanation for such a difference (for example, fraud losses are also included in the BHC's or IHC's or SLHC's *\$ Net Charge-offs* variable). If the adjustment factor variable represents more than one factor leading to the difference, provide a separate breakout of the multiple factors.

14. **\$ Foreclosure** - The total unpaid principal balance of loans in the foreclosure process. These dollars are pre-OREO and should be coded as a foreclosure in the system.
  15. **\$ New foreclosure** - The total unpaid principal balance of loans that entered the foreclosure process in the reporting month. These dollars are pre-OREO and should be coded as a foreclosure in the system.
  16. **\$ Other Real Estate Owned (OREO)** - The total unpaid principal balance of mortgages where the bank has obtained the title at foreclosure sale and the property is on the market and available for sale. Also include instances where the bank has obtained the title but the availability for sale is not known
  17. **\$ New OREO** - The total unpaid principal balance of foreclosed loans where the institution has bought back the property.
  18. **Weighted Average Life of Loans** - The Weighted Average Life of Loans 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 as of month-end. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in the segment, rounded to the nearest monthly term.
-

# DRAFT

## A.5 - International First Lien Mortgage

This section provides general guidance and data definitions for the International First Lien Mortgage Worksheet. In this worksheet, include all international first lien mortgage loans secured by real estate as defined in the FR Y-9C, Schedule HC-C, item 1 which meet the loan criteria of item 1.c.2.a. Include international first lien residential mortgage and international first lien closed-end home equity loans. Only include loans and leases held for investment at amortized cost; do not include loans or leases held for sale or held for investment and measured at fair value under the fair value option.

Segment the portfolio along all combinations of the segment variables listed in Section A below. There are two product type segments, three origination industry standard credit score or equivalent segments, four geography segments, two age segments, two origination LTV segments, and five delinquency status segments; therefore, the portfolio must be divided into a total of  $2*3*4*2*2*5 = 480$  distinct segments. Each segment should be identified by a unique twelve-digit segment ID (variable name: SEGMENT\_ID) based on the segment ID positions and attribute codes listed in Table A.5.a. For example, the segment containing fixed-rate loans (product type segment "01") that had an origination FICO score or equivalent of greater than 660 (original industry standard credit score or equivalent segment "02"), where the borrowers reside in the Asia Pacific region (geography segment "04"), are greater than three years old (age segment "02"), had an origination LTV of less than 80 percent (original LTV segment "01"), and are 180+ DPD (delinquency status segment "05") should be identified by the segment ID "010204020105". When reporting the segment ID, do not drop leading zeroes.

For each month in the required reporting period, report the summary variables listed below in Section B for each of the 480 portfolio segments described above. First time filers must submit all data for each month from January 2007 to the end of the current reporting period; returning filers must submit all data for each month in the current reporting period.

Start each row of data with your BHC or IHC or SLHC name (Variable name: BHC\_NAME), your RSSD ID number (Variable name: RSSD\_ID), the reporting month (Variable name: REPORTING\_MONTH), the portfolio ID (Variable name: PORTFOLIO\_ID), and segment ID (variable name: SEGMENT\_ID). Use the portfolio ID "IntFM" for your Portfolio ID within this worksheet. For each row, populate the segment variables listed in Table A.5.a and the summary variables listed in Table A.5.b. Provide all dollar amounts in millions.

Detailed instructions on how to submit the data will be provided separately.

### **A. Segment Variables**

Segment the portfolio along the following segment variables as described above. For each resulting segment, report the summary variables described in Section B.

- 1. Product type** – Segment the portfolio into product types based on payment terms of the loan (at origination). The portfolio should be segmented into two product types:  
01 - Fixed Rate  
02 - Other
- 2. Original commercially available credit bureau score or equivalent** – Segment the portfolio by the credit score of the borrower at origination using a commercially available credit bureau score (e.g. FICO Score, VantageScore, or another qualifying credit score). The original credit score used to assign a loan to a segment must be the score upon which the original underwriting decision was based. If the underwriting decision was based on an internal score, please map this score to an

# DRAFT

industry standard credit score. Please provide supporting documentation listing the credit score supplied or mapped to.

The ranges below should be used for loans for which FICO was either the original credit score used at origination or the commercially available credit bureau score to which an internal credit score was mapped. Ranges for other commercially available credit bureau scores will be provided upon request.

01 -  $\leq 660$

02 -  $> 660$

03 - N/A—Original credit score is missing or unknown

3. **Geography** – Report the region in which the property is located. Segment the portfolio into the following four geographical area designations:

01 - Region 1: Canada

02 - Region 2: EMEA—Europe, Middle East, and Africa

03 - Region 3: LATAM—Latin America and Caribbean

04 - Region 4: APAC—Asia Pacific

4. **Age** – Age refers to the time that has elapsed since the account was originated. There are two possible ages to report:

01 -  $\leq$  Three years old

02 -  $>$  Three years old

5. **Original LTV** – The original loan-to-value ratio is the original amount of the loan divided by the property value at the time of origination. Segment the portfolio as follows:

01 -  $< 80$

02 -  $\geq 80$

6. **Delinquency status** – Segment the portfolio into the following five delinquency statuses:

01 - Current & 1-29 days past due (DPD): Accounts that are not past due (accruing and non-accruing) or are 1-29 DPD (accruing and non-accruing) as of month-end.

02 - 30-89 DPD: Accounts that are 30 to 89 days past due (accruing and non-accruing) as of month-end.

03 - 90-119 DPD: Accounts that are 90 to 119 days past due (accruing and non-accruing) as of month-end.

04 - 120-179 DPD: Accounts that are 120 to 179 days past due (accruing and non-accruing) as of month-end.

05 - 180+ DPD: Accounts that are 180 or more days past due (accruing and non-accruing) as of month-end.

## **B. Summary Variables**

For each month in the reporting period, report the following summary variables for each segment described in Section A.

1. **# Accounts** – Total number of accounts on the book for the segment as of month-end.
2. **\$ Outstandings** – Total principal amount outstanding as of the end of the month. This should be reported as unpaid principal balance gross of any charge-offs. In other words, the \$ outstanding should not reflect any accounting based write-downs and should only be reduced to zero when the loan has been liquidated – either paid in full, charged off, or Other Real Estate Owned (OREO) sold.



# DRAFT

3. **# New accounts** – The total number of new accounts originated (or purchased) in the given month for the segment as of month-end.
4. **\$ New accounts** – The total dollar amount of new accounts originated (or purchased) in the given month for the segment as of month-end.
5. **\$ Gross contractual charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off during the reporting month, except where the charge-off arises from the bankruptcy of the borrower (see the variable \$ Bankruptcy Charge-offs). Also include write-downs to fair value on loans transferred to the held-for-sale account during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
6. **\$ Bankruptcy charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off due to bankruptcy during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
7. **\$ Recoveries** – The dollar amount recovered during the reporting month on loans in the segment that were previously charged-off. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column B of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Reversals of recoveries should be recorded as negative recoveries.
8. **\$ Net charge-offs** – The dollar amount of write-downs net on loans in the segment that were charged-off during the reporting month, net of any recoveries in the reporting month on loans in the segment that were previously charged-off. Generally, \$ Net Charge-offs should equal [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ].
9. **Adjustment factor to reconcile \$ gross contractual charge-offs to \$ net charge-offs** – If it is not the case that \$ net charge-offs equals [ $\$ \text{gross contractual charge-offs} + \$ \text{bankruptcy charge-offs} - \$ \text{recoveries}$ ], please provide the value of \$ net contractual charge-offs minus [ $\$ \text{gross contractual charge-offs} + \$ \text{bankruptcy charge-offs} - \$ \text{recoveries}$ ] in this variable. In a separate document included in your submission, provide an explanation for such a difference (for example, fraud losses are also included in the BHC's or IHC's or SLHC's \$ net charge-offs variable). If the adjustment factor variable represents more than one factor leading to the difference, provide a separate breakout of the multiple factors.
10. **\$ Foreclosure** - The total unpaid principal balance of loans in the foreclosure process. These dollars are pre-OREO and should be coded as a foreclosure in the system.
11. **\$ New foreclosure** - The total unpaid principal balance of loans that entered the foreclosure process in the reporting month. These dollars are pre-OREO and should be coded as a foreclosure in the system.
12. **\$ Other Real Estate Owned (OREO)** - The total unpaid principal balance of mortgages where the bank has obtained the title at foreclosure sale and the property is on the market and available for sale. Also include instances where the bank has obtained the title but the availability for sale is not known.

# DRAFT

- 13. \$ New OREO** - The total unpaid principal balance of foreclosed loans where the institution has bought back the property in auction in the reporting month.
- 14. Weighted Average Life of Loans** - The Weighted Average Life of Loans 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 as of month-end. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in the segment, rounded to the nearest monthly term.
-

# DRAFT

## A.6 – International Other Consumer Schedule

In this worksheet, include all international loans defined in the FR Y-9C, Schedule HC-C, item 6.b and 6.d, excluding student loans and non-purpose securities based loans and should also include all international non-auto leases as defined in the FR Y-9C, Schedule HC-C, item 10.a. Only include loans and leases held for investment at amortized cost; do not include loans or leases held for sale or held for investment and measured at fair value under the fair value option.

Segment the portfolio along all combinations of the segment variables listed in Section A below. There are five product type segments, five delinquency status segments, three original industry standard credit score or equivalent segments, two original LTV ratio segments, and four geography segments; therefore, the portfolio must be divided into a total of  $5*5*3*2*4 = 600$  distinct segments. Each segment should be identified by a unique ten-digit segment ID (variable name: SEGMENT\_ID) based on the segment ID positions and attribute codes listed in Table A.6.a. For example, the segment containing secured installment loans (product type segment “02”) that are 120+ DPD (delinquency status segment “05”), had an origination FICO score or equivalent of greater than 620 (original industry standard credit score or equivalent segment “02”), had an origination LTV ratio of greater than 70 percent (original LTV ratio segment “02”), and that were made to borrowers residing in the Asia Pacific region (geography segment “04”) should be identified by the segment ID “0205020204”. When reporting the segment ID, do not drop leading zeroes.

For each month in the required reporting period, report the summary variables listed below in Section B for each of the 600 portfolio segments described above. First time filers must submit all data for each month from January 2007 to the end of the current reporting period; returning filers must submit all data for each month in the current reporting period.

Start each row of data with your BHC or IHC or SLHC name (Variable name: BHC\_NAME), your RSSD ID number (Variable name: RSSD\_ID), the reporting month (Variable name: REPORTING\_MONTH), the portfolio ID (Variable name: PORTFOLIO\_ID), and segment ID (variable name: SEGMENT\_ID). Use “IntlOthCons” for portfolio ID for this worksheet. For each row, populate the segment variables listed in Table A.6.a and the summary variables listed in Table A.6.b. Provide all dollar amounts in millions.

Detailed instructions on how to submit the data will be provided separately.

### **A. Segment Variables**

Segment the portfolio along the following segment variables as described above. For each resulting segment, report the summary variables described in Section B.

- 1. Product type** – Reporting BHCs, IHCs and SLHCs should segment the portfolio into the following five product types based on the various features of the credit:
  - 01 - Secured-Revolving
  - 02 - Secured-Installment
  - 03 - Unsecured-Revolving
  - 04 - Unsecured-Installment
  - 05 - Overdraft
- 2. Delinquency status** – Reporting BHCs and IHCs should segment the portfolio into the following five delinquency statuses:
  - 01 - Current and 1-29 days past due (DPD): Accounts that are not past due (accruing and non-accruing) as of month-end and accounts that are 1 to 29 days past due

# DRAFT

- (accruing and non-accruing) as of month-end.
- 02 - 30-59 DPD: Accounts that are 30 to 59 days past due (accruing and non-accruing) as of month-end.
- 03 - 60-89 DPD: Accounts that are 60 to 89 days past due (accruing and non-accruing) as of month-end.
- 04 - 90-119 DPD: Accounts that are 90 to 119 days past due (accruing and non-accruing) as of month-end.
- 05 - 120+ DPD: Accounts that are 120 days or more past due (accruing and non-accruing) as of month-end.

3. **Original commercially available credit bureau score or equivalent** – Segment the portfolio by the credit score of the borrower at origination using a commercially available credit bureau score (e.g. FICO Score, VantageScore, or another qualifying credit score). The original credit score used to assign a loan to a segment must be the score upon which the original underwriting decision was based. If the underwriting decision was based on an internal score, please map this score to an industry standard credit score. Please provide supporting documentation listing the credit score supplied or mapped to.

The ranges below should be used for loans for which FICO was either the original credit score used at origination or the commercially available credit bureau score to which an internal credit score was mapped. Ranges for other commercially available credit bureau scores will be provided upon request.

01 -  $\leq 620$

02 -  $> 620$

03 - N/A— Original credit score is missing or unknown

4. **Original LTV**– The original combined loan-to-value ratio is the original amount of the loan or line, in addition to any senior liens, divided by the collateral value at the time of origination. For loans where the loan-to-value ratio is not applicable, include the lowest ratio for a segment identifier. Segment the portfolio as follows:

01 -  $\leq 70$  or not applicable

02 -  $> 70$

5. **Geography** –Segment the portfolio into the following four geographical area designations. The borrower’s current place of residency should be used to define the region.

01 - Region 1: Canada

02 - Region 2: EMEA—Europe, Middle East, and Africa

03 - Region 3: LATAM—Latin America and Caribbean

04 - Region 4: APAC—Asia-Pacific

## **B. Summary Variables**

For each month in the reporting period, report the following summary variables for each segment described in Section A.

1. **# Accounts** – Total number of accounts on the book for the segment being reported as of month-end.
2. **\$ Outstandings** – The total unpaid principal balance for accounts on the book for the segment being reported as of month-end.
3. **\$ Gross contractual charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off during the reporting month, except where the charge-off

# DRAFT

arises from the bankruptcy of the borrower (see the variable \$ Bankruptcy Charge-offs). Also include write-downs to fair value on loans transferred to the held-for-sale account during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.

4. **\$ Bankruptcy charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off due to bankruptcy during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
5. **\$ Recoveries** – The dollar amount recovered during the reporting month on loans in the segment that were previously charged-off. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column B of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Reversals of recoveries should be recorded as negative recoveries.
6. **\$ Net charge-offs** – The dollar amount of write-downs net on loans in the segment that were charged-off during the reporting month, net of any recoveries in the reporting month on loans in the segment that were previously charged-off. Generally, \$ Net Charge-offs should equal [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ].
7. **# New accounts** – The total number of new accounts originated in the given month for the segment being reported as of month-end.
8. **\$ New commitments** – The total dollar amount of new commitments on accounts originated in the given month for the segment being reported as of month-end. If unknown for some accounts due to acquisition or merger, report the credit line at acquisition.
9. **Weighted Average Life of Loans** – The Weighted Average Life of Loans 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 as of month-end. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in the segment, rounded to the nearest monthly term.

# DRAFT

## A.7 – US Other Consumer

In this worksheet, 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 securities based loans. Include domestic non-auto leases included as defined in the FR Y-9C, Schedule HC-C, item 10.a. Only include loans and leases held for investment at amortized cost; do not include loans or leases held for sale or held for investment and measured at fair value under the fair value option.

Segment the portfolio along all combinations of the segment variables listed in Section A below. There are five product type segments, five delinquency status segments, three original industry standard credit score or equivalent segments, and three original LTV ratio segments; therefore, the portfolio must be divided into a total of  $5*5*3*3 = 225$  distinct segments. Each segment should be identified by a unique eight-digit segment ID (variable name: SEGMENT\_ID) based on the segment ID positions and attribute codes listed in Table A.7.a. For example, the segment containing secured installment loans (product type segment “02”) that are 120+ DPD (delinquency status segment “05”), had an origination FICO score or equivalent of greater than 620 (original industry standard credit score or equivalent segment “02”), and had an origination LTV ratio of greater than or equal to 100 percent (original LTV ratio segment “03”) should be identified by the segment ID “02050203”. When reporting the segment ID, do not drop leading zeroes.

For each month in the required reporting period, report the summary variables listed below in Section B for each of the 225 portfolio segments described above. First time filers must submit all data for each month from January 2007 to the end of the current reporting period; returning filers must submit all data for each month in the current reporting period.

Start each row of data with your BHC or IHC or SLHC name (Variable name: BHC\_NAME), your RSSD ID number (Variable name: RSSD\_ID), the reporting month (Variable name: REPORTING\_MONTH), the portfolio ID (Variable name: PORTFOLIO\_ID), and segment ID (variable name: SEGMENT\_ID). Use “USOthCons” for the portfolio ID within this worksheet. For each row, populate the segment variables listed in Table A.7.a and the summary variables listed in Table A.7.b. Please provide all dollar amounts in millions.

Detailed instructions on how to submit the data will be provided separately.

### **A. Segment Variables**

Segment the portfolio along the following segment variables as described above. For each resulting segment, report the summary variables described in Section B.

- Product type** – Segment the portfolio into the following five product types based on the various features of the credit:
  - 01 - Secured-Revolving
  - 02 - Secured-Installment
  - 03 - Unsecured-Revolving
  - 04 - Unsecured-Installment
  - 05 - Overdraft
- Delinquency status** – Segment the portfolio into the following five delinquency statuses:
  - 01 - Current and 1-29 days past due (DPD): Accounts that are not past due (accruing and non-accruing) as of month-end and accounts that are 1 to 29 days past due (accruing and non-accruing) as of month-end.
  - 02 - 30-59 DPD: Accounts that are 30 to 59 days past due (accruing and non-accruing)

# DRAFT

- as of month-end.
- 03 - 60-89 DPD: Accounts that are 60 to 89 days past due (accruing and non-accruing) as of month-end.
- 04 - 90-119 DPD: Accounts that are 90 to 119 days past due (accruing and non-accruing) as of month-end.
- 05 - 120+ DPD: Accounts that are 120 days or more past due (accruing and non-accruing) as of month-end.

3. **Original commercially available credit bureau score or equivalent** – Segment the portfolio by the credit score of the borrower at origination using a commercially available credit bureau score (e.g. FICO Score, VantageScore, or another qualifying credit score). The original credit score used to assign a loan to a segment must be the score upon which the original underwriting decision was based. If the underwriting decision was based on an internal score, please map this score to an industry standard credit score. Please provide supporting documentation listing the credit score supplied or mapped to.

The ranges below should be used for loans for which FICO was either the original credit score used at origination or the commercially available credit bureau score to which an internal credit score was mapped. Ranges for other commercially available credit bureau scores will be provided upon request.

- 01 -  $\leq 620$
- 02 -  $> 620$
- 03 - N/A—Original credit score is missing or unknown

4. **Original LTV**– The original combined loan-to-value ratio is the original amount of the loan or line, in addition to any senior liens, divided by the collateral value at the time of origination. For unsecured loans for which loan-to-value is not applicable, report the summary variables in the segment entitled  $\leq 70$  or not applicable. Segment the portfolio as follows:
- 01 -  $\leq 70$  or not applicable
  - 02 -  $> 70$  and  $< 100$
  - 03 -  $\geq 100$

## **B. Summary Variables**

For each month in the reporting period, report the following summary variables for each segment described in Section A.

1. **# Accounts** – Total number of accounts on the book for the segment as of month-end.
2. **\$ Outstandings** – The total unpaid principal balance for accounts on the book for the segment as of month-end.
3. **\$ Gross contractual charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off during the reporting month, except where the charge-off arises from the bankruptcy of the borrower (see the variable \$ Bankruptcy Charge-offs). Also include write-downs to fair value on loans transferred to the held-for-sale account during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.

# DRAFT

4. **\$ Bankruptcy charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off due to bankruptcy during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
  5. **\$ Recoveries** – The dollar amount recovered during the reporting month on loans in the segment that were previously charged-off. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column B of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Reversals of recoveries should be recorded as negative recoveries.
  6. **\$ Net Charge-offs** – The dollar amount of write-downs net on loans in the segment that were charged-off during the reporting month, net of any recoveries in the reporting month on loans in the segment that were previously charged-off. Generally, \$ Net Charge-offs should equal [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ].
  7. **# New accounts** – The total number of new accounts originated in the given month for the segment as of month-end.
  8. **\$ New commitments** – The total dollar amount of new commitments on accounts originated in the given month for the segment as of month-end. If unknown for some accounts due to acquisition or merger, report the credit line at acquisition.
  9. **Weighted Average Life of Loans** – The Weighted Average Life of Loans 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 as of month-end. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in the segment, rounded to the nearest monthly term.
-



# DRAFT

## A.8 - International Small Business

In this worksheet, include all "scored" or "delinquency managed" international small business loans. The main differentiating factor between corporate loans and small business loans is how the consolidated holding company evaluates the creditworthiness of the borrower. For small business lending, banks look at the credit score of the borrower (scored rating) and/or use delinquency management. Therefore, small business loans are loans that are "scored" or "delinquency managed" for which a commercial internal risk rating is not used or that uses a different scale than other corporate loans. Include international small business loans as defined in the FR Y-9C, Schedule HC-C included in items 2.a, 2.b, 3, 4.a, 4.b, 7, 9.a, 9.b.2, and 10.b. Exclude corporate and SME credit card loans as defined in the FR Y-9C, Schedule HC-C, item 4.b. Exclude all non-purpose securities-based loans and loans for purchasing and carrying securities. Only include loans and leases held for investment at amortized cost; do not include loans or leases held for sale or held for investment and measured at fair value under the fair value option. For domestic small business loans, see the instructions for Worksheet 9.

Segment the portfolio along all combinations of the segment variables listed in Section A below. There are three product type segments, two age segments, four geography segments, three original industry standard credit score or equivalent segments, five delinquency status segments, and two secured or unsecured segments; therefore, the portfolio must be divided into a total of  $3*2*4*3*5*2 = 720$  distinct segments. Each segment should be identified by a unique twelve-digit segment ID (variable name: SEGMENT\_ID) based on the segment ID positions and attribute codes listed in Table A.8.a. For example, the segment containing term loans (product type segment "02") that are greater than three years old (age segment "02"), were made to borrowers that reside in the Asia Pacific region (geography segment "04"), had an origination FICO score or equivalent of greater than 620 (original industry standard credit score or equivalent segment "02"), are 120+ DPD (delinquency status segment "05"), and are secured (secured or unsecured segment "01") should be identified by the segment ID "020204020501". When reporting the segment ID, do not drop leading zeroes.

For each month in the required reporting period, report the summary variables listed below in Section B for each of the 720 portfolio segments described above. First time filers must submit all data for each month from January 2007 to the end of the current reporting period; returning filers must submit all data for each month in the current reporting period.

Start each row of data with your BHC name (Variable name: BHC\_NAME), your RSSD ID number (Variable name: RSSD\_ID), the reporting month (Variable name: REPORTING\_MONTH), the portfolio ID (Variable name: PORTFOLIO\_ID), and segment ID (variable name: SEGMENT\_ID). Use "IntSB" for the portfolio ID within this worksheet. For each row, populate the segment variables listed in Table A.8.a and the summary variables listed in Table A.8.b. Provide all dollar amounts in millions.

Detailed instructions on how to submit the data will be provided separately.

### **A. Segment Variables**

Segment the portfolio along the following segment variables as described above. For each resulting segment, report the summary variables described in Section B.

1. **Product type** - Segment the portfolio into the following product types as of month-end:
  - 01 - Line of Credit
  - 02 - Term Loan
  - 03 - Other

# DRAFT

2. **Age** - Age refers to the time that has elapsed since the account was originated.
  - 01 - <= Three years old
  - 02 - > Three years old
3. **Geography** –Segment the portfolio into the following four geographical area designations. The borrower’s current place of residency should be used to define the region.
  - 01 - Region 1: Canada
  - 02 - Region 2: EMEA—Europe, Middle East, and Africa
  - 03 - Region 3: LATAM—Latin America and Caribbean
  - 04 - Region 4: APAC—Asia-Pacific
4. **Original commercially available credit bureau score or equivalent** – Segment the portfolio by the credit score of the borrower at origination using a commercially available credit bureau score (e.g. FICO Score, VantageScore, or another qualifying credit score). The original credit score used to assign a loan to a segment must be the score upon which the original underwriting decision was based. If the underwriting decision was based on an internal score, please map this score to an industry standard credit score. Please provide supporting documentation listing the credit score supplied or mapped to.

The ranges below should be used for loans for which FICO was either the original credit score used at origination or the commercially available credit bureau score to which an internal credit score was mapped. Ranges for other commercially available credit bureau scores will be provided upon request.

- 01 - <= 620
- 02 - > 620
- 03 - N/A – Original credit score is missing or unknown

5. **Delinquency status** - Segment the portfolio into the following five delinquency statuses:
  - 01 - Current and 1-29 days past due (DPD): Accounts that are not past due (accruing and non- accruing) as of month-end and accounts that are 1 to 29 days past due (accruing and non-accruing) as of month-end.
  - 02 - 30-59 DPD: Accounts that are 30 to 59 days past due (accruing and non-accruing) as of month-end.
  - 03 - 60-89 DPD: Accounts that are 60 to 89 days past due (accruing and non-accruing) as of month-end.
  - 04 - 90-119 DPD: Accounts that are 90 to 119 days past due (accruing and non-accruing) as of month-end.
  - 05 - 120+ DPD: Accounts that are 120 or more days past due (accruing and non-accruing) as of month-end.
6. **Secured or unsecured:** Segment the portfolio based on the following two categories:
  - 01 - Secured
  - 02 - Unsecured

## **B. Summary Variables**

For each month in the reporting period, report the following variables for each segment described in Section A.

1. **# Accounts** – Total number of accounts on the book for the segment as of month-end.
2. **\$ Outstandings** – Total unpaid principal balance for accounts on the book for the segment as of month-end.

# DRAFT

3. **# New accounts** – The total number of new accounts originated (or purchased) in the given month for the segment as of month-end.
4. **\$ New accounts** – The total dollar amount of new accounts originated (or purchased) in the given month for the segment as of month-end.
5. **\$ Commitments** – The total dollar amount of commitments for the segment as of month-end.
6. **\$ Modifications** – Total unpaid principal balance of loans that have been adjusted as part of a loan modification program. For purposes of this Schedule, a loan modification occurs when the terms of the loan were changed from those stated in the original loan contract as part of loss mitigation efforts.
7. **\$ Gross contractual charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off during the reporting month, except where the charge-off arises from the bankruptcy of the borrower (see the variable \$ Bankruptcy Charge-offs). Also include write-downs to fair value on loans transferred to the held-for-sale account during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
8. **\$ Bankruptcy charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off due to bankruptcy during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
9. **\$ Recoveries** The dollar amount recovered during the reporting month on loans in the segment that were previously charged-off. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column B of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Reversals of recoveries should be recorded as negative recoveries.
10. **\$ Net charge-offs** – The dollar amount of write-downs net on loans in the segment that were charged-off during the reporting month, net of any recoveries in the reporting month on loans in the segment that were previously charged-off. Generally, \$ Net Charge-offs should equal [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ].
11. **Adjustment factor to reconcile \$ gross contractual charge-offs to \$ net charge-offs** – If it is not the case that \$ net charge-offs equals [ $\$ \text{gross contractual charge-offs} + \$ \text{bankruptcy charge-offs} - \$ \text{recoveries}$ ], provide the value of \$ net charge-offs minus [ $\$ \text{gross contractual charge-offs} + \$ \text{bankruptcy charge-offs} - \$ \text{recoveries}$ ] in this variable, and separately provide an explanation for the difference. As a separate document included in the submission, provide an explanation for such a difference (for example, fraud losses are also included in the reporting BHC's or IHC's or SLHC's \$ net charge-offs variable). If the adjustment factor variable represents more than one factor leading to the difference, provide a separate breakout of the multiple factors.
12. **Weighted Average Life of Loans** – The Weighted Average Life of Loans should reflect the current position, the impact of new business activity, as well as the impact of

# **DRAFT**

behavioral assumptions such as prepayments or defaults, based on the expected remaining lives, inclusive of behavioral assumptions as of month-end. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in the segment, rounded to the nearest monthly term.

---

# DRAFT

## A.9 - US Small Business

In this worksheet, include all "scored" or "delinquency managed" domestic small business loans. The main differentiating factor between corporate loans and small business loans is how the consolidated holding company evaluates the creditworthiness of the borrower. For small business lending, banks look at the credit score of the borrower (scored rating) and/or use delinquency management. Therefore, small business loans are loans that are "scored" or "delinquency managed" for which a commercial internal risk rating is not used or that uses a different scale than other corporate loans. Include domestic small business loans as defined in the FR Y-9C, Schedule HC-C included in items 2.a, 2.b, 3, 4.a, 4.b, 7, 9.a, 9.b.2, and 10.b. Exclude corporate and SME credit card loans as defined in the FR Y-9C, Schedule HC-C, item 4.a. Exclude all non-purpose securities-based loans and loans for purchasing and carrying securities. Only include loans and leases held for investment at amortized cost; do not include loans or leases held for sale or held for investment and measured at fair value under the fair value option. For international small business loans, see the instructions for Worksheet 8.

Segment the portfolio along all combinations of the segment variables listed in Section A below. There are three product type segments, two age segments, three original industry standard credit score or equivalent segments, five delinquency status segments, and two secured or unsecured segments; therefore, the portfolio must be divided into a total of  $3*2*3*5*2 = 180$  distinct segments. Each segment should be identified by a unique ten-digit segment ID (variable name: SEGMENT\_ID) based on the segment ID positions and attribute codes listed in Table A.9.a. For example, the segment containing term loans (product segment "02") that are less than or equal to three years old (age segment "01"), had an origination FICO score or equivalent of greater than 620 (original industry standard credit score or equivalent segment "02"), are 120+ DPD (delinquency status segment "05"), and are secured (secured or unsecured segment "01") should be identified by the segment ID "0201020501". When reporting the segment ID, do not drop leading zeroes.

For each month in the required reporting period, report the summary variables listed below in Section B for each of the 180 portfolio segments described above. First time filers must submit all data for each month from January 2007 to the end of the current reporting period; returning filers must submit all data for each month in the current reporting period.

Start each row of data with your BHC or IHC or SLHC name (Variable name: BHC\_NAME), your RSSD ID number (Variable name: RSSD\_ID), the reporting month (Variable name: REPORTING\_MONTH), the portfolio ID (Variable name: PORTFOLIO\_ID) and segment ID (variable name: SEGMENT\_ID). Use "USSB" for portfolio ID within this worksheet. For each row, populate the segment variables listed in Table A.9.a and the summary variables listed in Table A.9.b. Provide all dollar amounts in millions.

Detailed instructions on how to submit the data will be provided separately.

### **A. Segment Variables**

Segment the portfolio along the following segment variables as described above. For each resulting segment, report the summary variables described in Section B.

1. **Product type** - Segment the portfolio into the following product types as of month-end:
  - 01 - Line of Credit
  - 02 - Term Loan
  - 03 - Other
2. **Age** - Age refers to the time that has elapsed since the account was originated.

# DRAFT

01 - <= Three years old

02 - > Three years old

### 3. **Original commercially available credit bureau score or equivalent –**

Segment the portfolio by the credit score of the borrower at origination using a commercially available credit bureau score (e.g. FICO Score, VantageScore, or another qualifying credit score). The original credit score used to assign a loan to a segment must be the score upon which the original underwriting decision was based. If the underwriting decision was based on an internal score, please map this score to an industry standard credit score. Please provide supporting documentation listing the credit score supplied or mapped to.

The ranges below should be used for loans for which FICO was either the original credit score used at origination or the commercially available credit bureau score to which an internal credit score was mapped. Ranges for other commercially available credit bureau scores will be provided upon request.

01 - <= 620

02 - > 620

03 - N/A - Original credit score is missing or unknown

### 4. **Delinquency status** - Segment the portfolio into the following five delinquency statuses:

01 - Current and 1-29 (days past due) DPD: Accounts that are not past due (accruing and non-accruing) as of month-end and accounts that are 1 to 29 days past due (accruing and non-accruing) as of month-end.

02 - 30-59 DPD: Accounts that are 30 to 59 days past due (accruing and non-accruing) as of month-end.

03 - 60-89 DPD: Accounts that are 60 to 89 days past due (accruing and non-accruing) as of month-end.

04 - 90-119 DPD: Accounts that are 90 to 119 days past due (accruing and non-accruing) as of month-end.

05 - 120+ DPD: Accounts that are 120 or more days past due (accruing and non-accruing) as of month-end.

### 5. **Secured or unsecured:** Segment the portfolio based on the following two categories:

01 - Secured

02 - Unsecured

## **B. Summary Variables**

For each month in the reporting period, report the following summary variables for each segment described in Section A.

1. **# Accounts** – Total number of accounts on the book for the segment as of month-end.
2. **\$ Outstandings** – Total unpaid principal balance for accounts on the book for the segment as of month-end.
3. **# New accounts** – The total number of new accounts originated (or purchased) in the given month for the segment as of month-end.
4. **\$ New accounts** – The total dollar amount of new accounts originated (or purchased) in the given month for the segment as of month-end.
5. **\$ Commitments** – The total dollar amount of commitments for the segment as of

# DRAFT

month-end.

6. **\$ Modifications** – Total unpaid principal balance of loans that have been adjusted as part of a loan modification program. For purposes of this Schedule, a loan modification occurs when the terms of the loan were changed from those stated in the original loan contract as part of loss mitigation efforts.
7. **\$ Gross contractual charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off during the reporting month, except where the charge-off arises from the bankruptcy of the borrower (see the variable \$ Bankruptcy Charge-offs). Also include write-downs to fair value on loans transferred to the held-for-sale account during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
8. **\$ Bankruptcy charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off due to bankruptcy during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
9. **\$ Recoveries** – The dollar amount recovered during the reporting month on loans in the segment that were previously charged-off. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column B of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Reversals of recoveries should be recorded as negative recoveries.
10. **\$ Net charge-offs** – The dollar amount of write-downs net on loans in the segment that were charged-off during the reporting month, net of any recoveries in the reporting month on loans in the segment that were previously charged-off. Generally, \$ Net Charge-offs should equal [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ].
11. **Adjustment factor to reconcile \$ gross contractual charge-offs to \$ net charge-offs** – If it is not the case that \$ net charge-offs equals [ $\$ \text{gross contractual charge-offs} + \$ \text{bankruptcy charge-offs} - \$ \text{recoveries}$ ], provide the value of \$ net charge-offs minus [ $\$ \text{gross contractual charge-offs} + \$ \text{bankruptcy charge-offs} - \$ \text{recoveries}$ ] in this variable, and separately provide an explanation for the difference. In a separate document included in the submission, provide an explanation for such a difference (for example, fraud losses are also included in the reporting BHC's or IHC's or SLHC's \$ Net Charge-offs variable). If the adjustment factor variable represents more than one factor leading to the difference, provide a separate breakout of the multiple factors.
12. **Weighted Average Life of Loans** – The Weighted Average Life of Loans 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 as of month-end. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in the segment, rounded to the nearest monthly term.

# DRAFT

## A.10 – Student Loan

In this worksheet, include all student loans as defined in the FR Y-9C, Schedule HC-C, lines 6.b and 6.d. Only include loans and leases held for investment at amortized cost; do not include loans or leases held for sale or held for investment and measured at fair value under the fair value option.

Segment the portfolio along all combinations of the segment variables listed in Section A below. There are two product type segments, five age segments, three original industry standard credit score or equivalent segments, five delinquency status segments, and four education level segments; therefore, the portfolio must be divided into a total of  $2*5*3*5*4 = 600$  distinct segments. Each segment should be identified by a unique ten-digit segment ID (variable name: SEGMENT\_ID) based on the segment ID positions and attribute codes listed in Table A.10.a. For example, the segment containing government guaranteed student loans (product type segment “01”) that are less than three years old (age segment “05”), had an origination FICO score or equivalent of greater than 660 (original industry standard credit score or equivalent segment “02”), are 120+ DPD (delinquency status segment “05”), and were made to loan recipients pursuing an undergraduate degree (education level segment “01”) should be identified by the segment ID “0105020501”. When reporting the segment ID, do not drop leading zeroes.

For each month in the required reporting period, report the summary variables listed below in Section B for each of the 600 portfolio segments described above. First time filers must submit all data for each month from January 2007 to the end of the current reporting period; returning filers must submit all data for each month in the current reporting period only.

Start each row of data with your BHC or IHC or SLHC name (Variable name: BHC\_NAME), your RSSD ID number (Variable name: RSSD\_ID), the reporting month (Variable name: REPORTING\_MONTH), the portfolio ID (Variable name: PORTFOLIO\_ID), and segment ID (variable name: SEGMENT\_ID). Use the portfolio ID “Student” for portfolio ID for this worksheet. For each row, populate the segment variables listed in Table A.10.a and the summary variables listed in Table A.10.b. Provide all dollar amounts in millions.

Detailed instructions on how to submit the data will be provided separately.

### **A. Segment Variables**

Segment the portfolio along the following segment variables as described above. For each resulting segment, report the summary variables described in Section B.

- 1. Product type** – Reporting institutions should segment the portfolio into the following two product types. An example of a government guaranteed loan is a FFELP loan.
  - 01 - Managed - Gov Guaranteed
  - 02 - Managed – Private
- 2. Age** – Refers to the time that has elapsed since the loan was originated. If there were multiple disbursements tied to an original then use the time since the first disbursement. There are five possible ages to report:
  - 01 - 6 years  $\leq$  Age
  - 02 - 5 years  $\leq$  Age  $<$  6 years
  - 03 - 4 years  $\leq$  Age  $<$  5 years
  - 04 - 3 years  $\leq$  Age  $<$  4 years
  - 05 - Age  $<$  3 years



# DRAFT

## 3. **Original commercially available credit bureau score or equivalent –**

Segment the portfolio by the credit score of the borrower at origination using a commercially available credit bureau score (e.g. FICO Score, VantageScore, or another qualifying credit score). The original credit score used to assign a loan to a segment must be the score upon which the original underwriting decision was based. If the underwriting decision was based on an internal score, please map this score to an industry standard credit score. Please provide supporting documentation listing the credit score supplied or mapped to.

The ranges below should be used for loans for which FICO was either the original credit score used at origination or the commercially available credit bureau score to which an internal credit score was mapped. Ranges for other commercially available credit bureau scores will be provided upon request.

01 -  $\leq 660$

02 -  $> 660$

03 - N/A— Original credit score is missing or unknown

## 4. **Delinquency status** - Reporting institutions should segment the portfolio into the following five delinquency statuses:

01 - Current + 1-29 DPD: Accounts that are not past due (accruing and non-accruing) as of month-end and accounts that are 1 to 29 days past due (accruing and non-accruing) as of month-end.

02 - 30-59 DPD: Accounts that are 30 to 59 days past due (accruing and non-accruing) as of month-end.

03 - 60-89 DPD: Accounts that are 60 to 89 days past due (accruing and non-accruing) as of month-end.

04 - 90-119 DPD: Accounts that are 90 to 119 days past due (accruing and non-accruing) as of month-end.

05 - 120+ DPD: Accounts that are 120 or more days past due (accruing and non-accruing) as of month-end.

## 5. **Education level** – The level of education being pursued by the recipient of the loan. For consolidated loans, report the highest level of education pursued by the borrower.

01 - Undergraduate – 4 year

02 - Graduate / Professional

03 - Other (e.g. community college, trade school, etc.)

04 - Not available

## **B. Summary Variables**

For each month in the reporting period, report the following summary variables for each segment described in Section A.

1. **# Accounts** – Total number of accounts on the book for the segment as of month-end.
2. **\$ Outstandings** – Total unpaid principal balance for accounts on the book for the segment as of month-end.
3. **# Accounts in repayment** – Total number of accounts on the book for the segment as of month-end that have entered the loan's repayment period.
4. **\$ Outstandings in repayment** – Total unpaid principal balance for accounts on the book for the segment as of month-end that have entered the loan's repayment period.

# DRAFT

5. **# New disbursements** – The total number of new disbursements in the given month for the segment as of month-end.
6. **\$ New disbursements** – The total dollar amount disbursed in the given month for the segment as of month-end.
7. **\$ of Unpaid principal balance with co-signer** – The dollar amount of unpaid principal balance in the segment that was underwritten with a co-signer reported as of the month-end.
8. **\$ of Unpaid principal balance in grace** – The dollar amount of unpaid principal balance for accounts that are in grace status for the segment being reported as of month-end.
9. **\$ of Unpaid principal balance in deferment** – The dollar amount of unpaid principal balance for accounts that are in deferment status for the segment being reported as of month-end.
10. **\$ of Unpaid principal balance in forbearance** – The dollar amount of unpaid principal balance for accounts that are in forbearance status for the segment being reported as of month-end.
11. **\$ CDR [0% through 1.99%]** - The total unpaid principal balance in the segment that has a school cohort default rate as computed by the Department of Education falling within 0% through 1.99% as of the month-end.
12. **\$ CDR [2% through 3.99%]** – The total unpaid principal balance in the segment that has a school cohort default rate as computed by the Department of Education falling within 2% through 3.99% as of the month-end.
13. **\$ CDR [4% through 5.99%]** – The total unpaid principal balance in the segment that has a cohort default rate falling within 4% through 5.99% as of the month-end.
14. **\$ CDR [6% through 7.99%]** – The total unpaid principal balance in the segment that has a cohort default rate falling within 6% through 7.99% as of the month-end.
15. **\$ CDR [8% through 9.99%]** – The total unpaid principal balance in the segment that has a cohort default rate falling within 8% through 9.99% as of the month-end.
16. **\$ CDR > 10%** - The total unpaid principal balance in the segment that has a cohort default rate falling above 10% as of the month-end.
17. **\$ CDR = N/A** - The total unpaid principal balance in the segment that has no cohort default rate as of the month-end.
18. **\$ Gross contractual charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off during the reporting month, except where the charge-off arises from the bankruptcy of the borrower (see the variable \$ Bankruptcy Charge-offs). Also include write-downs to fair value on loans transferred to the held-for-sale account during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.

# DRAFT

19. **\$ Bankruptcy charge-offs** – The dollar amount of write-downs on loans in the segment that were charged-off due to bankruptcy during the reporting month. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column A of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off.
20. **\$ Recoveries** – The dollar amount recovered during the reporting month on loans in the segment that were previously charged-off. The amount reported here should be consistent with the amount reported on Schedule HI-B, Part I, Column B of the FR Y-9C. For the Delinquency Status segment, categorize charged-off loans by their delinquency status at charge-off. Reversals of recoveries should be recorded as negative recoveries.
21. **\$ Net Charge-offs** – The dollar amount of write-downs net on loans in the segment that were charged-off during the reporting month, net of any recoveries in the reporting month on loans in the segment that were previously charged-off. Generally, \$ Net Charge-offs should equal [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ].
22. **Adjustment factor to reconcile \$ gross contractual charge-offs to \$ net charge-offs** – If it is not the case that \$ Net Charge-offs equals [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ], provide the value of \$ Net Charge-offs minus [ $\$ \text{Gross Contractual Charge-offs} + \$ \text{Bankruptcy Charge-offs} - \$ \text{Recoveries}$ ] in this variable, and separately provide an explanation for the difference. As a separate document included in the submission, provide an explanation for such a difference (for example, fraud losses are also included in the Reporting Institution's \$ Net Charge-offs variable). If the adjustment factor variable represents more than one factor leading to the difference, provide a separate breakout of the multiple factors.
23. **Weighted Average Life of Loans** – The Weighted Average Life of Loans 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 as of month-end. It should reflect the weighted average of time to principal actual repayment (as modeled) for all positions in the segment, rounded to the nearest monthly term.

# DRAFT

## Schedule B—Securities

Each BHC or IHC or SLHC should submit the two schedules (B.1 and B.2) comprising the FR-Y-14 Quarterly Securities data. The BHCs, IHCs and SLHCs should refer to the separate Technical Submission Instructions for details on the technical specifications of these schedules including the schedule naming convention, row headers, and value formats. The first schedule (B.1 - Securities 1) is the Main Schedule containing the individual security-level data. The second (B.2 - Securities 2) provides additional detail on securities in the Main Schedule that are part of designated hedge accounting relationships.<sup>11</sup>

Please refer to Accounting Standards Codification (ASC) Topic 320, Investments—Debt and Equity Securities (formerly FASB Statement No. 115, Accounting for Certain Investments in Debt and Equity Securities) for additional guidance when preparing this schedule.

If the instrument exists and is reported on the FR Y9C as of quarter-end, then it should be included in this schedule. Institutions are encouraged to provide further details on its hedging practices in supplemental materials if the institution believes doing so will provide additional and relevant clarity.

A unique identifier must be included to identify each unique record for each of the sub-schedules B.1 and B.2, as discussed below.

Exclude from this schedule all securities held for trading and securities the holding company has elected to report at fair value under a fair value option even if holding company management did not acquire the securities principally for the purpose of selling them in the near term. Also exclude securities that have been sold, but not settled as of the quarter-end date.

### **B.1—Securities 1 (“Main Schedule”)**

The Securities 1 schedule collects individual security-level details on positions, security type, cumulative OTTI (credit and non-credit related impairments) by security, and accounting intent (AFS or HTM). Amounts should be reported in U.S. dollars (USD). The reporting of Securities should follow balance sheet classification of the FR Y-9C (e.g., Securities will correspond with Schedule HC-B breakdowns or be classified as Equity securities with readily determinable fair values not held for trading included in FR Y-9C, Schedule HC, item 2.c). Any securities not specifically excluded from this schedule should be reported. Additionally, the method of reporting individual security-level information should be consistent with the level of aggregation the company uses to assess impairment and measure realized and unrealized gains and losses on investment securities under GAAP (ASC paragraph 320-10-35-20).<sup>12</sup>

In circumstances whereby the BHC or IHC or SLHC holds securities in both AFS and HTM categories within a given asset class, separate each security in to separate line items.

The following information should be reported in this schedule.

#### ***Unique ID***

---

<sup>11</sup> References to credit impairment models under current U.S. GAAP that would be outside the scope of CECL will be eliminated from the instructions upon full adoption of ASU 2016-13. This includes, but is not limited to, references to OTTI, ASC 310-10, ASC 310-30, and ASC 320-10.

<sup>12</sup> In Schedule B.1, institutions that have adopted ASU 2016-13 should report allowances for credit losses on AFS and HTM debt securities. References to OTTI, credit impairment, and ASC 310-30 do not apply to these institutions and will be eliminated upon full adoption of ASU 2016-13.

# DRAFT

A unique identifier must be included to identify each unique record. For a given security position, the same Unique ID should be used from one period to the next.

## ***Identifier Type and Identifier Value***

Report individual security-level data for all available-for-sale (AFS) and held-to-maturity (HTM) securities, adding new rows as necessary. Generally, securities should always be reported with a public identifier, if available, such as a valid CUSIP, ISIN, or SEDOL. If a valid CUSIP, ISIN or SEDOL identifier exists for the security, please report the value of the chosen identifier (the CUSIP, ISIN, or SEDOL code) and indicate the identifier type as “CUSIP”, “ISIN”, or “SEDOL”. If a CUSIP, ISIN, or SEDOL identifier is not available for a given security, please report an alternative public identifier value, if available, and report the identifier type. If only an internal identifier is available and provided, please report the identifier type as “INTERNAL.” Securities where an internal identifier is reported must have additional information reported in the Security Description 2 or Security Description 3 fields that clarifies the name of the security or issuer and the nature of the obligation (see the general requirement for securities in the “Other” Security Description 1 category), to the extent that the Security Description 2 and Security Description 3 fields are available after meeting any specific requirements in the instructions for these fields under “Security Description” below. For the purpose of this field, CUSIP means either a CUSIP or CINS (CUSIP International Numbering System) code.

## ***Private Placement***

Please enter “Y” if the security is a private placement security or other non-publicly offered security or “N” if it is a publicly offered security. For clarity, please enter “Y” for Rule 144A securities and direct purchase municipal securities (as defined in the Municipal Securities Rulemaking Board’s Notice 2011-52).

## ***Security Description***

Report the security description as indicated below.

*Agency MBS:* Report mortgage-backed securities (MBS) issued or guaranteed by U.S. Government agencies.

*Auction Rate Securities:* Report 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).

*CDO:* Report 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.

*CLO:* Report 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.

*CMBS:* Report 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).

*Common Stock (Equity):* Report common stock (equity). Provide the name of the issuer in the Security Description 2 column.

# DRAFT

*Auto ABS:* Report asset-backed securities (ABS) collateralized by auto loans.

*Credit Card ABS:* Report asset-backed securities (ABS) collateralized by credit card loans.

*Student Loan ABS:* Report asset-backed securities (ABS) collateralized by student loans.

*Other ABS (excl HEL ABS):* Report all other ABS that cannot properly be reported as auto ABS, credit card ABS, student loan ABS or home equity loan ABS; such as, leasing, Small Business Association (SBA) and fleet (auto) and floor plan ABS.

*Corporate Bond:* Report corporate bonds. Corporate bonds are debt obligations issued by corporations and may be secured or unsecured.

*Covered Bond:* Report 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.

*Domestic Non-Agency RMBS (incl HEL ABS):* Report residential mortgage-backed securities (RMBS), including securities backed by home equity loans, that are issued by domestic non-government agency entities.

*Foreign RMBS:* Report residential mortgage-backed securities of foreign issuers. Provide the country in the Security Description 2 column.

*Municipal Bond:* Report bonds issued by U.S. states, cities, counties, and other governmental entities at or below the state level. For example, include bonds issued by Canadian provinces or other local government entities and bonds issued by other non-US local government entities. In the Description 2 column, report the sector from the list below that best describes the principal source of repayment and intended use of the capital raised by the offering.

- General Obligation - State
- General Obligation - Local
- Revenue - Single Family Housing
- Revenue - Multi-Family Housing
- Revenue - Hospitals and Health Care
- Revenue - Education
- Revenue - Industrial Development Revenue
- Revenue - Utilities
- Revenue - Transportation
- Revenue - Tax
- Revenue - Other
- Appropriation-Backed<sup>13</sup>
- Other

*Mutual Fund:* Report investments in mutual funds, including money market mutual funds and mutual funds that invest solely in U.S. government securities. In the Description 2 column, enter either “Money Market Mutual Fund” for investments in money market mutual funds or similar cash reserve instruments or “Non-Money Market Mutual Fund” for all other

---

<sup>13</sup> For a definition of appropriation-backed debt, please refer to the Municipal Securities Rulemaking Board glossary definition for subject-to-appropriation-debt.

# DRAFT

categories of mutual funds. Provide the name of the fund in the Description 3 column.

*Preferred Stock (Equity):* Refer to the FR Y-9C Glossary entry for “Preferred Stock.” Provide the issuer name in the Security Description 2 column.

*Sovereign Bond:* Report bonds issued by the central governments of foreign countries. Provide the two-letter Country ISO code in the Security Description 2 column. 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 (e.g., non-central government(s)); and obligations of supranational organizations such as the International Bank for Reconstruction and Development (World Bank), Inter-American Development Bank, and Asian Development Bank. Sovereign Bonds that are issued by supranational entities should identify the issuer of the bond in the second or third security description column in place of a country code. Additionally, for non-guaranteed government securities, include additional information in the remaining description columns to explain the source of repayment (if not full faith and credit of the sovereign).

*US Treasuries & Agencies:* Exclude mortgage-backed securities. Report 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, and FDIC Structured Sale Guaranteed Notes and NCUA Guaranteed Notes.

*Other:* Report all securities that cannot properly be reported in the categories above. It is required to use the Security Description 2 and/or Security Description 3 columns to provide a description of the security that clarifies the name of the security or issuer, type or nature of obligation, and, if applicable, key terms such as the maturity date and stated interest rate.

## ***Exposure to Debt/Equity Security (USD Equivalent)***

Report exposure to the debt/equity security as indicated below.

*Amortized Cost (USD Equivalent):* In general, amortized cost is the purchase price of a debt security adjusted for amortization of premium or accretion of discount if the debt security was purchased at other than par or face value (for more information, refer to the FR Y-9C Glossary entry for “premiums and discounts”).

*Market Value (USD Equivalent):* In general, market value is “the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.” For further information, refer to ASC Topic 820, Fair Value Measurements and Disclosures (formerly FASB Statement No. 157, *Fair Value Measurements*) and the FR Y-9C glossary entry for “fair value.”

*Current Face Value (USD Equivalent):* The nominal dollar amount of the security as of the report date.

*Original Face Value (USD Equivalent):* The nominal dollar amount originally assigned to the security by the issuer.

## ***OTTI Taken***

Report the cumulative amount of other-than-temporary impairments (OTTI) recognized in earnings in the calendar year to date by the BHC or IHC or SLHC on the security (for clarity,

# DRAFT

please include only the portion of OTTI recorded in form FR Y-9C, Schedule HI, memoranda item 17.

Institutions that have not adopted ASU 2016-13 should continue to report OTTI taken. Institutions that have adopted ASU 2016-13 do not report OTTI taken, but must report the Amount of Allowance for Credit Losses and Writeoffs.

## ***Amount of Allowance for Credit Losses***

For AFS securities, report the allowance for credit losses by the BHC or IHC on the security. For HTM securities, report the allowance for credit losses on the security if such information is available at security level. If only pool level information is available, report this field as: pool-level amount of allowance for credit losses \* (the security's amortized cost) / (total amortized cost in the pool).

## ***Writeoffs***

Report any writeoffs of this security during the quarter on a quarter-to-date basis.

## ***Accounting Intent***

Indicate whether the security is available-for-sale (AFS) or held-to-maturity (HTM). For equity securities with readily determinable fair values not held for trading included in FR Y-9C, Schedule HC, item 2.c, report "EQ" in this field.

## ***Price***

Report the price of the security associated with the reported market value in USD. In general, this is the value that, when multiplied by the current USD equivalent face value or nominal amount of the security, results in the USD equivalent amount that would be received (excluding accrued interest) if the security were sold at market value. A security whose market value is equal to its outstanding face value has a price of 100. For equity securities, report the price per share.

## ***Pricing Date***

Report the pricing date of the security.

## ***Book yield<sup>14</sup>***

Report the effective interest rate that would be used to determine credit losses on debt instruments for other-than-temporary impairment (OTTI) purposes in accordance with ASC Topic 320. This item is not required for equity and mutual fund securities. For securitization debt, this relates to the yield implicit at the time of acquisition. This value should be the original unamortized yield, without subsequent adjustments for paydowns or accretion. However, if the reported book yield differs from the yield determined according to the methodology above, such as using the retrospective interest method for only structured notes outlined in ASC 320-10-35-40, document the reason for the use of the alternative in supplemental materials.

## ***Purchase Date<sup>15</sup>***

Report the date on which the security was purchased or acquired in the case of credit

---

<sup>14</sup> Institutions that have adopted ASU 2016-13 should report the effective interest rate that would be used to determine the allowance for credit losses allocated to the respective security in Book Yield. When ASU 2016-13 is effective for all institutions, language around OTTI will be updated to the new treatment from ASC Topic 326 regarding allowance for credit losses on HTM and AFS securities.

<sup>15</sup> Institutions that have adopted ASU 2016-13 should report the date on which the security was purchased or acquired in the case of credit sensitive securities that are evaluated for credit loss purposes in accordance with ASC Topic 326. When ASU 2016-13 is effective for all institutions, language around OTTI will be updated to the new treatment from ASC Topic 326 regarding allowance for credit losses on HTM and AFS securities.



# DRAFT

sensitive securities that are evaluated for other-than-temporary impairment (OTTI) purposes in accordance with ASC Topic 320, Investments—Debt and Equity Securities (formerly FASB Statement No. 115, Accounting for Certain Investments in Debt and Equity Securities). The purchase date should be the date associated with the amortized cost and book yield of the security (exclude for equity and mutual fund securities). If current holdings of the same security were acquired in different periods, provide the amounts and respective purchase dates distinct trade lots in separate rows of the worksheets. The preferred method for reporting purchases and sales of securities is as of trade date. However, settlement date accounting is acceptable if the reported amounts would not be materially different. (See the Glossary entry for “trade date and settlement date accounting” in the FR Y-9C instructions).

## ***Currency***

Indicate the currency denomination of contractual payments on the security, or for an equity security, the currency in which it trades in its principal exchange, using the standard ISO 4217 three-letter currency code (e.g., USD, EUR, GBP, CAD, etc.). For the avoidance of doubt, whether or not the value of this field is USD (U.S. dollars), all amounts reported in this schedule must be in USD-equivalent terms as of the reporting date.

# DRAFT

## **B.2—Securities 2 (“Investment Securities with Designated Accounting Hedges”)**

The Securities 2 schedule contains information on investment security hedging relationships designated under GAAP as cash flow or fair value hedges of AFS or HTM securities. All amounts should be reported in U.S. dollars. Gains and losses should be reported gross of tax.

In each row, report the unique ID, identifier type and identifier value using the corresponding instructions for Securities 1 for each investment security for which the BHC or IHC or SLHC has an existing qualifying hedging relationship. Security holdings listed in this worksheet should be a subset of the line-by-line holdings reported in the Securities 1 schedule and use a consistent ID, Identifier Type and Identifier Value for matching purposes. In addition, for qualifying hedging relationships reported on Securities 2, the unique ID reported for the investment security on Securities 1 must also be reported.

There should be one row submitted for each distinct investment security hedging relationship. Use multiple rows to reflect one-to-many relationships: For example, if multiple hedging relationships apply to a single security holding, please list each hedging relationship affecting the security in a separate row of the Securities 2 file, repeating relevant details about the hedged security. (This treatment would apply, for example, if distinct hedging instruments – such as interest rate and foreign exchange hedging instruments – hedge different risks of the same holding and are accounted for separately, or if a fair value hedge co-exists with a cash flow hedge to address distinct risks.) Similarly, if a portfolio hedge is used to hedge more than one security under a single hedging relationship, please list each of the hedged security holdings in separate rows alongside the characteristics and *allocable* amount of the associated portfolio hedging instrument. If a hedging instrument hedges an investment security and also hedges assets that are not investment securities, report the amount allocable to the investment security (or securities) being hedged.

Please refer to the following table for detailed instructions on each column of this worksheet. The abbreviation ASC stands for the Financial Accounting Standards Board Accounting Standards Codification. In general, in the instructions that follow, the terms hedging instrument and hedged item follow their usage in the ASC. Note that *hedging instrument* may refer either to a single instrument or derivative that hedges the hedged item in a hedging relationship, or a group of instruments jointly considered a hedging instrument under a single hedging relationship.

# DRAFT

Field No.	Field Name	Description	Allowable Values
1	Identifier Type	Report the identifier type for an investment security for which the BHC or IHC or SLHC has an existing qualifying accounting hedging relationship, and whose identifier value is provided in Field 2 (“Identifier Value”). If more than one distinct qualifying hedging relationship exists for the security, please list the security more than once.	See Securities 1 instructions
2	Identifier Value	Report the identifier value for an investment security for which the BHC or IHC or SLHC has an existing qualifying accounting hedging relationship. If more than one distinct qualifying hedging relationship exists for the security, please list the security more than once.	See Securities 1 instructions
3	Amortized Cost (USD Equivalent)	Report the amortized cost (USD equivalent) of the security being hedged. This amount should equal the amount recorded in the Securities 1 file for this security, unless the amount in Securities 1 contains trade lots or holdings that are not part of the hedging relationship, in which case only include the amortized cost of the holdings of the security that are hedged under the qualifying hedging relationship.	See Securities 1 instructions
4	Market Value (USD Equivalent)	Report the market value (USD equivalent) of the security being hedged. This amount should equal the amount recorded in the Securities 1 file for this security, unless the amount in Securities 1 contains trade lots or holdings that are not part of the hedging relationship, in which case only include the amortized cost of the holdings of the security that are hedged under the qualifying hedging relationship.	See Securities 1 instructions
5	Accounting Intent (AFS, HTM, EQ)	Indicate whether the security being hedged is available-for-sale (AFS), held-to-maturity (HTM), or an equity security (EQ).	See Securities 1 instructions
6	Type of Hedge(s)	Report the type of hedge (fair value or cash flow hedge) associated with the holding as defined by ASC 815. Make this indication for each hedged security, whether it is hedged individually or is hedged as part of a portfolio of assets with similar risk that are hedged as a group in line with ASC 815-20-25-12 (b), ASC 815-20-2512A, or ASC 815-10-25-15.	1= Fair Value Hedge, 2=Cash Flow Hedge.

# DRAFT

Field No.	Field Name	Description	Allowable Values
7	Hedged Risk	Indicate the risk being hedged, among the potential hedged risks described under ASC 815-20-25-12 and ASC 815-20-25-15.	1=Overall Change in Fair Value or Variability in Cash Flows, 2=Interest Rate Risk, 3=Foreign Exchange Risk, 4=Credit Risk, 5 = Interest Rate Risk & Foreign Exchange Risk, 6= Interest Rate Risk & Credit Risk, 7= Foreign Exchange Risk & Credit Risk, 8 = Interest Rate Risk & Foreign Exchange Risk & Credit Risk, 9= Change in Fair Value of Embedded Call or Put Option, 10=Other, 11= Not applicable.
8	Hedge Interest Rate	For hedges of interest rate risk, indicate the benchmark interest rates from among those eligible under ASC 815-20-25-6A and other relevant guidance.	1=US Treasury Security Interest Rate, 2=London Interbank Offered Rate (LIBOR) Swap Rate, 3=Federal Funds Effective Swap Rate, 4 =Other, 5 = Not applicable.
9	Hedge Percentage	Indicate, in the case of a designated fair value hedge, the portion of the asset being hedged, as determined according to ASC 815-20-25-12 (b) and ASC 815-20-25-12A. Enter a decimal value.  If the hedge is allocated to 100 percent of the securities notional or 100 percent of the hedged risk associated with the investment amounts reported in Fields 3 and 4 (amortized cost and market value), please enter a value of 1.  If the associated hedge is a designated cash flow hedge of foreign currency fluctuation, please indicate the percentage of principal or interest cash flows (as applicable) being hedged in accordance with ASC 815-20-25-41.	Enter a numeral in decimal format with up to 4 decimal places between 0 and 1, inclusive.
10	Hedge Horizon	If the hedge is a fair value hedge, report the latest date of the remaining effectiveness horizon (e.g., the remaining life of the derivative instrument or an applicable shorter period, as discussed in ASC 815-20-25-118), consistent with the documented risk management strategy for the fair value hedge.  If the hedge is a cash flow hedge, report the latest date within which the latest transaction covered by the hedge is expected to occur, in line with the documentation requirements under ASC 815-20-25-3 and the effectiveness testing requirements under ASC 815-20-25.	Must be in yyyy- mm-dd format, e.g.: 2005-02-01 1999-12-14

# DRAFT

Field No.	Field Name	Description	Allowable Values
11	Hedged Cash Flow	Indicate the type of cash flow associated with the hedge if it is a cash flow hedge.	1=Principal and Interest Cash Flows, 2=Interest Only, 3=Principal Only, 4=A Fixed Portion of Either Principal or Interest Cash Flows, 5=Other 6= Not applicable.
12	Sidedness	Indicate whether the hedging instrument provides a one-sided effective offset of the hedged risk, as permitted under ASC 815-20-25-76.	1=One-sided. 2= Not One-sided.
13	Hedging Instrument at Fair Value	Indicate the USD-equivalent fair value of the hedging instrument used to hedge the security under the indicated hedging relationship. The hedging instrument associated with the hedged security may consist of a proportion of a whole derivative (see ASC 815-20-25-45), in which case report the applicable portion of the hedging derivative's fair value. In addition, more than one instrument may be used in combination as a hedging instrument, in which case report the sum of the allocable fair values of these instruments.	Rounded positive or negative whole dollar amount with no cents, e.g.: 20000000  Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal). For negative values use a negative sign '-', not parentheses.
14	Effective Portion of Cumulative Gains and Losses	Indicate the effective portion of the gains and losses in the quarter in USD of the hedging instrument(s), associated with the hedged risk and hedged percentage of the security.	Rounded positive or negative whole dollar amount with no cents, e.g.: 20000000  Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal). For negative values use a negative sign '-', not parentheses.
15	ASU 2017-12 Hedge Designations	Indicate if any of the ASU 2017-12 hedge designations allowed in conjunction with partial-term hedging election in ASC 815-20-25-12b(2)(ii) are applicable. These designations are described in ASC 815-20-25-12A and 815-25-35-13B.	1= Last-of-Layer; 2= One or more selected contractual cash flows; 3= Not applicable

# DRAFT

## Schedule C—Regulatory Capital Instruments

### General guidance

The FR Y-14Q Regulatory Capital Instruments quarterly schedules collect historical data of BHCs' and IHCs' transactions in and balances of funded instruments that are included in regulatory capital as well as subordinated debt instruments and their related hedging instruments – included in FR Y-9C line item BHCK4062, "Subordinated notes and debentures." They collect historical data at the CUSIP level on the balances of each funded regulatory capital instrument, in addition to information on any issuances and redemptions of individual instruments that occurred during the quarter. The quarterly schedule does not require BHCs or IHCs to report changes in the balances of capital instruments due to amortizations or accretions as either Redemptions or Issuances. Note: **All subordinated debt instruments must be included, regardless of whether or not the instrument is included in regulatory capital.**

**Concurrently with their initial submission of the Regulatory Capital Instruments schedule, a new filer of FRY-14Q Schedule C must make a one-time submission of all subordinated debt as of quarter end that includes all of the information required in schedule C.3 (Issuances During Quarter) for each subordinated debt instrument outstanding as of quarter end. Report in Column I the notional dollar amount of the instrument as of quarter end.**

### C.1—Regulatory Capital and Subordinated Debt Instruments as of Quarter End

This worksheet collects historical information on the BHCs' and IHCs' regulatory capital and subordinated debt instruments as of the end of the most recent quarter. Complete this worksheet with details on each of these funded instruments as of quarter end. For each instrument, provide the applicable details below:

Columns I through Columns N apply to subordinated debt instruments, related interest rate hedges as well as any new interest rate hedges associated with outstanding subordinated debt instruments.

For a subordinated debt instrument with multiple hedging instruments (interest rate swaps), report the sum of the values for all interest rate swaps. There should be one CUSIP number and one line associated with each subordinated debt instrument.

### **Column Instructions**

#### **Column B      Committee on Uniform Security Identification Procedures (CUSIP) or unique identifier provided by BHC or IHC**

Report the CUSIP number or unique identification number assigned to the instrument as provided by the BHC or IHC. If there are different instrument types associated with one CUSIP, report the same CUSIP across multiple rows, provided that a different Instrument Type is used for each recurrence of the respective CUSIP.

#### **Column C      Instrument type**

Report the type of regulatory capital instrument. Instruments should be reported based on whether they were included in Tier 1 or Tier 2 regulatory capital. This item should indicate: Common Stock, CPP TARP Preferred, CS USG Investment, CS Warrants, Cumulative Dated

# DRAFT

Preferred (TRUPS), Cumulative Perpetual Preferred (CPP), Mandatory Convertible Preferred (MCP), MCP USG Preferred, NCPP Convertible, Non-Cumulative Perpetual Preferred (NCPP), Other Tier 1 Instruments, Other Tier 2 Instruments, REIT Preferred, Subordinated Debt, USG Preferred TRUPS, or Subordinated Debt.

## **Column D Regulatory capital rule treatment**

Report the regulatory capital treatment for the instrument as per the regulatory capital rule (See generally 12 CFR 217). If the instrument being reported is a subordinated debt instrument not included in regulatory capital, "NA" should be reported.

## **Column E Cumulative/noncumulative**

Report whether the instrument's coupon/dividend is cumulative or noncumulative.

## **Column F Notional amount (\$Millions)**

Report the notional dollar amount of the instrument as of quarter end.

## **Column G Amount recognized in regulatory capital (\$Millions)**

Report the dollar amount of the instrument that qualified as regulatory capital as of quarter end.

## **Column H Comments**

Use this field to report any supporting information regarding the instrument, including how it relates to amounts approved in the BHC's or IHC's capital plan. Comments should also reflect summary balance variances by Instrument Type.

## **Column I Carrying value, as of quarter-end (\$Millions)**

Report the carrying value of the instrument. This number should match the value that enters in FR Y-9C line item BHCK4062, "Subordinated notes and debentures". For subordinated debt with multiple interest rate swaps, report the sums of the full carrying values of the underlying note.

## **Column J Unamortized discounts/premiums, fees, and foreign exchange translation impacts as of quarter-end (\$Millions)**

Report the dollar amount of unamortized discounts/ premiums, fees, and foreign exchange translation impact (for FX-denominated instruments) associated with the instrument. For subordinated debt with multiple interest rate swaps, report the sums of the full amounts of unamortized discounts/ premiums, fees, and foreign exchange translation impact (for FX-denominated instruments) associated with the underlying note.

## **Column K Fair value of swaps, as of quarter end (\$Millions)**

Report the dollar value of swaps associated with the instrument that enter FR Y-9C line item BHCK4062, "Subordinated notes and debentures." For subordinated debt with multiple interest rate swaps, report the sums of the fair values of all the interest rate swaps associated with the instrument detailed in this line.

## **Column L Notional amount of interest rate swap (\$Millions)**

Report the notional dollar amount of the interest rate swap associated with the instrument. For subordinated debt with multiple interest rate swaps, report the notional amount for all the interest rate swaps associated with the instrument detailed in this line.

## **Column M Currency denomination of the instrument**

Report the currency the instrument is denominated in. If the relevant currency is not in the drop down box, specify the currency in the Comments field.

# DRAFT

## **Column N Y-9C BHCK 4062 reconciliation**

If the carrying value in column I differs from the amount that enters in in FR Y-9C line item BHCK 4062, provide an explanation in this field. Also provide an explanation for the discrepancy between the sum of carrying values in column I and the amount reported in FR Y-9C line item BHCK 4062. The discrepancy may come from life-time preferred stock included in BHCK 4062 for example.

## **C.2—Regulatory Capital and Subordinated Debt Instrument Repurchases/Redemptions During Quarter**

BHCs and IHCs are to complete this worksheet with details on any repurchase or redemption activity for its capital and subordinated debt instruments during the quarter. For each instrument that was subject to a redemption or repurchase, provide the applicable details below.

Note: Do not use this worksheet to report decreases in the amount of any capital instrument that are the result of amortizations of the remaining balance of the instrument. Any changes due to amortizations of instruments that occurred during the quarter should be reflected in the balances of those instruments as reported on the *C.1-Regulatory Capital and Subordinated Debt Instruments as of Quarter End* worksheet.

Decreases in APIC resulting from employee stock compensation-related drivers should not be captured in sub-schedule C.2. Decreases in APIC as a result of treasury stock being issued at a price lower than its cost basis (i.e., the accounting amount of the stock held on the firm's balance sheet) must not be captured in sub-schedule C.2.

An IHC must report remittances of capital to a non-IHC entity such as its foreign parent if it reduces the IHC's regulatory capital, even if it does not arise from the payment on or repurchase or redemption of a regulatory capital instrument. Reductions in APIC on sub-schedule C.2 should reflect only instances in which an IHC remits capital to its foreign parent outside the context of payment on or redemption of an internal capital instrument. An example of this would be the reversal of contributed capital that was originally paid by the parent to the IHC in the form of cash. In these instances, report the CUSIP with the following convention: P00000001, P00000002, etc.

## **Column Instructions**

### **Column B Committee on Uniform Security Identification Procedures (CUSIP) or unique identifier provided by BHC or IHC**

Report the CUSIP number or unique identification number assigned to the instrument as provided by the BHC or IHC. If there are different instrument types associated with one CUSIP, report the same CUSIP across multiple rows, provided that a different Instrument Type is used for each recurrence of the respective CUSIP. If there are duplicate records with the same CUSIP and Instrument Type, the firm should append a differentiating feature on the end of the CUSIP (e.g., "V1" and "V2", etc.) and specify in the comments column that these are in fact swaps on the same CUSIP.

### **Column C Instrument type**

Report the type of regulatory capital instrument. This item should also indicate where common stock is related to employee compensation (Common Stock - Employee Stock Compensation), and remissions of capital to a foreign parent entity for IHCs (APIC - Foreign Parent), in addition to the following items: Common Stock, CPP TARP Preferred, CS USG Investment, CS Warrants, Cumulative Dated Preferred (TRUPS), Cumulative Perpetual Preferred (CPP), Mandatory Convertible Preferred (MCP), MCP USG Preferred, NCPP



# DRAFT

Convertible, Non-Cumulative Perpetual Preferred (NCPP), Other Tier 1 Instruments, Other Tier 2 Instruments, REIT Preferred, Subordinated Debt, USG Preferred TRUPS, or Subordinated Debt.

## **Column D Regulatory capital rule treatment**

Report the regulatory capital treatment for the instrument as per the regulatory capital rule (See generally 12 CFR 217). If the instrument being reported is a subordinated debt instrument not included in regulatory capital, "NA" should be reported.

## **Column E Redemption action**

Report the redemption action executed on the instrument.

## **Column F Date on which action was executed (mm/dd/yyyy)**

Report the date on which the redemption/repurchase action was executed.

## **Column G Notional amount transacted (\$Millions)**

Report the notional dollar amount by which the instrument was reduced as a result of the redemption/repurchase action.

## **Column H Regulatory capital amount transacted (\$Millions)**

Report the dollar amount of regulatory capital by which the instrument was reduced as a result of the redemption/repurchase action.

## **Column I Notional amount remaining at quarter end (\$Millions)**

Report the remaining notional dollar amount of the instrument as of quarter end.

## **Column J Amount recognized in regulatory capital remaining at quarter end (\$Millions)**

Report the remaining dollar amount of the instrument that was included in regulatory capital as of quarter end.

## **Column K Comments**

Use this field to report any supporting information regarding the instrument, including how it relates to amounts approved in the BHC's or IHC's capital plan. Comments should also reflect summary balance variances by Instrument Type.

## **C.3 – Regulatory Capital and Subordinated Debt Instruments Issuances During Quarter**

BHCs and IHCs are to complete this worksheet with details on any issuances of capital and subordinated debt instruments – as well as any related hedging instruments, which includes new hedges on outstanding subordinated debt instruments - that were issued during the quarter. For each issued instrument, provide the applicable details below.

For a subordinated debt instrument with multiple hedging instruments (swaps), please report on multiple lines with the naming convention: CUSIP\_1, CUSIP\_2, etc., where CUSIP is the unique identifier of the underlying instrument. Columns C-Z and BB-CC should be repeated for all swap and reflect the underlying instrument, even though the entries may be the same due to the swaps having the same underlying instrument.

Note: Do not use this worksheet to report increases in the amount of any capital instruments that are the result of accretions that occurred during the quarter. Any changes

# DRAFT

due to accretions that occurred during the quarter should be reflected in the balances of those instruments as reported on the *C.1 - Regulatory Capital Instruments as of Quarter End* worksheet.

Increases in APIC resulting from employee stock compensation-related drivers should not be captured in sub-schedule C.3.

An IHC must report capital contributions to the IHC from a non-IHC entity such as its foreign parent if it increases the IHC's regulatory capital, even if it does not arise from the issuance of a regulatory capital instrument from the IHC to that entity. In these instances, report the CUSIP with the following convention: P00000001, P00000002, etc.

## Column Instructions

### **Column B**      **Committee on Uniform Security Identification Procedures (CUSIP), International Securities Identification Number (ISIN) or unique identifier provided by BHC or IHC**

Report the CUSIP or ISIN number. If the instrument does not have a CUSIP or ISIN, provide the unique identification number assigned to the instrument as provided by the BHC or IHC. For subordinated debt with multiple swaps, please report on multiple lines with the naming convention CUSIP\_1, CUSIP\_2, etc., where CUSIP is the unique identifier of the underlying instrument. If there are different instrument types associated with one CUSIP, report the same CUSIP across multiple rows, provided that a different Instrument Type is used for each recurrence of the respective CUSIP. If there are duplicate records with the same CUSIP and Instrument Type, the firm should append a differentiating feature on the end of the CUSIP (e.g., "v1" and "v2", etc.) and specify in the comments column that these are in fact swaps on the same CUSIP.

### **Column C**      **Instrument type**

Report the type of regulatory capital instrument. Instruments should be reported based on whether they were actually included in Tier 1 or Tier 2 regulatory capital. This item should also indicate where common stock is related to employee compensation (Common Stock - Employee Stock Compensation) and contributions of surplus capital from a foreign parent entity for IHCs (APIC - Foreign Parent), in addition to the following items: Common Stock, CPP TARP Preferred, CS USG Investment, CS Warrants, Cumulative Dated Preferred (TRUPS), Cumulative Perpetual Preferred (CPP), Mandatory Convertible Preferred (MCP), MCP USG Preferred, NCPP Convertible, Non-Cumulative Perpetual Preferred (NCPP), Other Tier 1 Instruments, Other Tier 2 Instruments, REIT Preferred, Subordinated Debt, USG Preferred TRUPS, or Subordinated Debt.

### **Column D**      **Is issuance result of conversion?**

Report whether the issued instrument is the result of a conversion.

### **Column E**      **If conversion, indicate CUSIP of original instrument**

For issuances that are the result of a conversion, report the CUSIP of the instrument from which the new issuance was converted.

### **Column F**      **Date of issuance (mm/dd/yyyy)**

Report the date the instrument was issued.

### **Column G**      **Regulatory capital rule treatment**

Report the regulatory capital treatment for the instrument as per the regulatory capital rule (See generally 12 CFR 217). If the instrument being reported is a subordinated debt

# DRAFT

instrument not included in regulatory capital, “NA” should be reported.

## **Column H Cumulative/noncumulative**

Report whether the instrument’s coupon/dividend is cumulative or noncumulative.

## **Column I Notional amount transacted (\$Millions)**

Report the notional dollar amount of the issued instrument. For subordinated debt with multiple swaps, report the full notional amount transacted of the underlying instrument.

## **Column J Regulatory capital amount transacted (\$Millions)**

Report the dollar amount of the instrument that qualified as regulatory capital as of quarter end.

## **Column K Perpetual/dated**

Report whether the issued instrument is of fixed maturity (“dated”) or of no fixed date when capital will be returned to the investor (“perpetual”).

## **Column L If dated, date of maturity (mm/dd/yyyy)**

For instruments of fixed maturity (i.e., “dated” instruments), report the maturity date. For “perpetual” instruments, report “NA”.

## **Column M Issuer call**

Report whether there is an issuer call option for the instrument.

## **Column N If callable, optional call date (mm/dd/yyyy)**

For instruments that feature an issuer call option, report the first date of call.

## **Column O Fixed/floating**

Report whether the instrument has a fixed coupon, a floating coupon/dividend, steps up or converts from paying a fixed to paying a floating coupon.

## **Column P Coupon/dividend rate (dividend yield) (bps) at issuance**

For instruments with fixed coupon/dividends, report the coupon/dividend rate for the instrument at issuance. For instruments that have a floating coupon/dividend or that have neither a fixed nor floating coupon/dividend rate (such as common stock), input the coupon/dividend rate paid in the reporting quarter.

## **Column Q Index at issuance**

For instruments with a coupon/dividend rate that is linked to the rate of a particular index, report the index to which it is linked at issuance. For instruments with a fixed coupon/dividend rate, report “NA.” If the index is not available, specify the index in the Comments field.

## **Column R Spread over index (bps) at issuance**

For instruments with a coupon/dividend rate that is linked to the rate of a particular index, report the spread over the relevant index in basis points (e.g., 1M LIBOR+50bps should be reported as “50”) at issuance. For instruments that have a fixed coupon/dividend rate or that have neither a fixed nor floating coupon/dividend rate, report “NA”.

## **Column S Date at which coupon terms change**

For instruments that step up or convert from paying a fixed rate to paying a floating coupon, specify the date at which the rate change occurs. If the terms of the instrument do not change, report “NA.”

# DRAFT

## **Column T Coupon/dividend rate (bps) when terms change**

For instruments that step up, report the coupon/dividend rate for the instrument after the change of terms. If the terms of the instrument do not change, report "NA."

## **Column U Index when terms change**

For instruments that convert from paying a fixed rate to paying a coupon/dividend rate that is linked to the rate of a particular index, report the index to which it is linked. Select from options in the drop down box. If the index is not available in the drop down menu, specify the index in the Comments field. If the terms of the instrument do not change, report "NA."

## **Column V Spread over index (bps) when terms change**

For instruments that convert from paying a fixed rate to paying a coupon/dividend with a coupon/dividend rate that is linked to the rate of a particular index, report the spread over the relevant index in basis points (e.g., 1M LIBOR+50bps should be reported as "50"). If the terms of the instrument do not change, report "NA."

## **Column W Existence of step up or other incentive to redeem**

Report whether the instrument features a step up or other incentive to redeem the security. Step-up securities initially pay the investor an above-market yield for a short period and then, if not called, "step up" to a higher coupon rate.

## **Column X Convertible/non-convertible**

Report whether the instrument is convertible into another instrument or non-convertible.

## **Column Y If convertible, mandatory or optional conversion?**

For instruments that are convertible into another instrument, report whether the conversion is mandatory or optional. For non-convertible instruments, report "NA".

## **Column Z If convertible, specify the instrument type into which it will convert**

For instruments that are convertible into another instrument, report the type of instrument into which the instrument will convert. For non-convertible instruments, report "NA".

## **Column AA Comments**

Use this field to report any supporting information regarding the instrument, including how it relates to amounts approved in the BHC's capital plan. Comments should also reflect summary balance variances by Instrument Type. If the nature of the swap (fixed-to-floating, floating-to-fixed, FX) is not self-evident, please provide details here.

## **Columns BB through HH**

Not applicable.

## **Column II Swap index**

If the interest rate swap is fixed-to-floating, report the index to which the swap payment is linked. If the interest rate swap is floating-to-fixed, report the index to which the received leg is linked. If the index is not available in the drop down box, please specify index in the Comments field. For instruments unrelated to an index report "N/A".

## **Column JJ Swap spread over index (bps)**

Report the effective spread (the paid-spread-over-index rate plus the difference between the fixed coupon on the underlying note and the received fixed rate on the swap) over the relevant index in basis points (e.g., 1M LIBOR+50bps should be reported as "50"). For instruments unrelated to an index report "N/A".

## **Column KK**

# DRAFT

Not applicable.

**Column LL Currency of foreign exchange swap payment**

If a foreign exchange swap is associated with the instrument, report the currency of the swap payment. For example, for an instrument denominated in EUR, a foreign exchange swap may imply a USD payment for a receipt of EUR. The currency of the swap payment is thus USD. Select from options in the drop down box. If the relevant currency is not in the drop down box, please specify the currency in the Comments field. If the terms of the swaps associated with the instrument and accounted for in FR Y-9C line item BHCK4062, "Subordinated notes and debentures," and BHCK4397, "Interest on Subordinated Notes and Debentures and on Mandatory Convertible Securities," are not represented adequately on the form, please provide additional information on swaps in the Comments field.

**Column MM Notional amount of foreign exchange swap (\$ Million)**

Report the notional dollar amount of the foreign exchange swap associated with the instrument.

**Column NN Exchange rate implied by foreign exchange swap**

Report the exchange rate of the foreign exchange swap. Express the exchange rate as the amount of currency reported in column LL per unit of currency reported in Schedule C.1, column M.

# DRAFT

## Schedule D—Regulatory Capital

### General Guidance

For the purposes of the Regulatory Capital Schedule, all BHCs and IHCs must reflect the regulatory capital and supplementary leverage ratio for the reporting quarter. Where applicable, BHCs and IHCs should also reference the methodology descriptions outlined within the FR Y-9C, Schedule HC-R. Please note, however, that numbers do not need to tie to the FR Y-9C reports, given that the FR Y-14 Transitions schedule requires calculations on a fully phased-in basis. Similarly, the FR Y-14Q, Schedule D, should not reflect any election of the CECL transition provision.

The Regulatory Capital schedule collects additional data necessary to calculate the items that may receive limited recognition in Common Equity Tier 1 (i.e., significant and non-significant investments in the common shares of unconsolidated financial institutions, mortgage servicing assets and deferred tax assets arising from temporary differences) that are not collected on the FR Y-9C.

Data should be provided in all non-shaded items; shaded items are derived and will be automatically populated.

# DRAFT

## Category I and II firms only (line items 1-9)

### **Non-Significant investments in the capital of unconsolidated financial institutions in the form of common stock**

#### **Line item 1 Aggregate amount of non-significant investments in the capital of unconsolidated financial institutions**

Report the gross amount of non-significant investments in the capital of unconsolidated financial institutions, including the form of common stock, additional tier 1, and tier 2 capital.

#### **Line item 2 Non-significant investments in the capital of unconsolidated financial institutions in the form of common stock**

Report the gross amount of non-significant investments in the capital of unconsolidated financial institutions in the form of common stock.

#### **Line item 3 10 percent threshold for non-significant investments**

Report the 10 percent threshold for non-significant investments. This is calculated as common equity tier 1 capital before adjustments and deductions, less deductions and adjustments for goodwill, intangible assets, DTAs that arise from net operating loss and tax credit carryforwards, AOCI-related adjustments, and other deductions from (additions to) common equity tier 1 capital before threshold-based deductions.

#### **Line item 4 Amount to be deducted from common equity tier 1 due to 10 percent deduction threshold**

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

### **Significant investments in the capital of unconsolidated financial institutions in the form of common stock**

#### **Line item 5 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.

#### **Line item 6 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 7 Significant investments in the capital of unconsolidated financial institutions in the form of common stock net of short positions**

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

#### **Line item 8 10 percent common equity tier 1 deduction threshold**

Report the 10 percent common equity tier 1 deduction threshold.-

#### **Line item 9 Amount to be deducted from common equity tier 1 due to 10 percent deduction threshold**

# DRAFT

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

## Category III and IV firms only (line items 10-12)

### Investments in the capital of unconsolidated financial institutions

#### Line item 10 Aggregate amount of investments in the capital of unconsolidated financial institutions.

Report the gross amount of non-significant investments in the capital of unconsolidated financial institutions, significant investments in the capital of unconsolidated financial institutions that are in the form of common stock, and significant investments in the capital of unconsolidated financial institutions that are not in the form of common stock.

#### Line item 11 25 percent threshold for investments in the capital of unconsolidated financial institutions

Report the 25 percent common equity tier 1 deduction threshold.

#### Line item 12 Amount to be deducted from common equity tier 1 due to 25 percent deduction threshold

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

### **Mortgage servicing assets**

#### **Line item 130 Total mortgage servicing assets classified as intangible**

Mortgage servicing assets may receive limited recognition when calculating common equity tier 1, with recognition typically capped at 10% or 25% of the bank's common equity (after the application of all regulatory adjustments).

#### **Line item 141 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, with recognition capped at 10% or 25% of the bank's common equity tier 1 (after the application of all regulatory adjustments). 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 152 Mortgage servicing assets net of related deferred tax liabilities**

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

#### **Line item 163 Common equity tier 1 deduction threshold: 10 percent for Category I and II firms, 25% for Category III and IV firms ~~common equity tier 1 deduction threshold~~**

Report the 10 percent common equity tier 1 deduction threshold for Category I and II firms and the 25 percent common equity tier 1 deduction threshold for Category III and IV firms. This item is derived based on item 8, 10 percent common equity tier 1 deduction threshold.

#### **Line item 174 Amount to be deducted from common equity tier 1 due to ~~10 percent~~ deduction threshold**

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



# DRAFT

## Deferred tax assets due to temporary differences

**Line item ~~185~~ Deferred tax assets arising from temporary differences, net of deferred tax liabilities ~~DTLs~~** Report the aggregate amount of DTAs arising from temporary differences net of [deferred tax liabilities \(DTLs\)](#). 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.

**Line item ~~196~~ Valuation allowances related to DTAs arising from temporary differences**

Report any valuation allowances related to DTAs arising from temporary differences.

**Line item ~~2017~~ Potential net operating loss carrybacks**

Report the amount of taxes previously paid that the bank or intermediate holding company could recover through net operating loss carrybacks. 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.

**Line item ~~2118~~ ———DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs**

Net deferred tax assets arising from temporary differences may receive limited recognition in common equity tier 1, with recognition capped at 10% [or 25%](#) of the bank's common equity (after the application of all regulatory adjustments).

**Line item ~~2219~~ [Common equity tier 1 deduction threshold: 10 percent for Category I and II firms, 25 percent for Category III and IV firms](#) ~~common equity tier 1 deduction threshold~~**

This item is derived from ~~other~~ item [1586; no imput required, 10 percent common equity tier 1 deduction threshold](#).

**Line item ~~230~~ Amount to be deducted from common equity tier 1 due to ~~10 percent~~ deduction threshold**

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

**[Category I and II firms only \(line items 24-28\)](#)**

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

**Line item ~~241~~ Sum of items 7, ~~152~~, and ~~2118~~**

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

**Line item ~~252~~ 15 percent common equity tier 1 deduction threshold**

Report the 15% common equity tier 1 deduction threshold.

**Line item ~~263~~ Sum of items 9, ~~174~~, and ~~230~~**

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

# DRAFT

**Line item ~~274~~ Item ~~241~~ minus item ~~263~~**

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

**Line item ~~285~~ Amount to be deducted from common equity tier 1 due to 15 percent deduction threshold**

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

**Other Quarterly Changes**

**Line item ~~296~~ Issuance of Common Stock (Including Conversion of Common Stock)**

Captures the total issuance of common stock and related surplus in the reporting period on a quarterly basis.

**Line item ~~3027~~ Repurchases of Common Stock**

Captures the total repurchases of common stock in the reporting period on a quarterly basis.

**MEMORANDA**

**Line item M1 Taxes paid through the as-of date of the current fiscal year**

Report the amount of taxes paid during the current fiscal year through the as-of date that are included in Schedule D, line item 17, assuming that fiscal years align with calendar years.

**DRAFT**

**DRAFT**

# DRAFT

## Schedule E—Operational Risk

### General Instructions

Each quarter an institution must submit **the Operational Loss History** and **Legal Reserve Frequency** data files. In addition to the Loss Reference Number, please include a unique identifier for each row of data in the firm's FR-Y14Q data submission in section E.1.. Unique identifiers in Section E.1 should remain constant with the specified row of data in subsequent submissions, and become a permanent element of the data for those schedules.

### E.1—Operational Loss History

Submit a complete history of operational losses at and above the institution's established collection threshold(s) in accordance with the following instructions.

The data file should contain all operational losses, with the exception of data on legal reserves and non-legal reserves, captured by the institution as of the respective reporting quarter end, starting from the point-in-time at which the institution began capturing operational loss event data in a systematic manner.

An operational loss is defined as a financial loss (excluding insurance or tax effects) resulting 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 an event that results in loss and is associated with any of the seven operational loss event type categories (Level 1) identified and defined in Reference Table E.1.a.

Each loss event must contain a unique loss reference number. A single operational loss event could have multiple impacts (e.g., several accounting or recovery dates) and/or could be assigned to multiple business lines. In cases where the institution submits a single loss event that has multiple impacts and/or is assigned to multiple business lines, **the same loss reference number must be used** to link these individual records to the same event.

The requirement for reporting a loss event is based on the event's total loss amount, regardless of how the loss amount is distributed. For example, if an institution's collection threshold is \$10,000 and a single loss event of \$12,000 was assigned evenly to three business lines (i.e., \$4,000 each), then the event needs to be included in the institution's submitted data file.

The intent of the Operational Loss Schedule (in the FR Y-14Q) is to capture actual or realized losses. Operational losses should be included in the Schedule from the quarter when the loss is settled and/or realized. This will often differ from the accounting date and capture dates.

Do *not* report separate, distinct operational loss events on an *aggregated* basis. For example, the "bundling" of *separate* loss events that fall below the institution's established threshold into one loss event record should not be reported.

Foreign banking institutions should report operational losses that impact the institution's U.S. operations in accordance with these reporting instructions.

**Ensure that the information provided for each reporting field conforms to the instructions in the Operational Loss Data Collection Schedule in Section E.1.**

# DRAFT

## Section E.1. Operational Loss Data Collection Schedule

Field Reference	Field Name	Description	Format N:Numeric C: Character A:Alphanumeric
A	Section E.1 Unique Identifier	Report the unique identifier for each row of data in the institution's FR-Y14Q data submission for Section E.1. The unique identifier should remain constant with the specified row of data in subsequent submissions, and become a permanent element of the data. The unique identifier should not include any white spaces, tabs, or special characters.	A
B	Reference Number	Report the unique institution-established identifier assigned to each loss event. The reference number should not include any white spaces, tabs, or special characters.	A
C	Capture Date	Report the date that the institution captured/recorded the loss event in its internal operational loss database. The Capture Date must be submitted in the following format: MM/DD/YYYY. For example, "January 5, 2011," should be "01/05/2011."	Date MM/DD/YYYY
D	Occurrence Date	Report the date that the operational loss event occurred or began. The Occurrence must be submitted in the following format: MM/DD/YYYY. For example, "January 5, 2011," should be "01/05/2011."	Date MM/DD/YYYY
E	Discovery Date	Report the date that the operational loss event was first discovered by the institution. The loss event's discovery date should not be earlier than its occurrence date. The Discovery Date must be submitted in the following format: MM/DD/YYYY. For example, "January 5, 2011," should be "01/05/2011."	Date MM/DD/YYYY
F	Accounting Date	Report the date that the financial impact of the operational loss event was recorded on the institution's financial statements. The accounting date should be consistent with, and no later than, the date a legal reserve is established. Generally, the loss event's accounting date should not be earlier than its occurrence date or discovery date; however, there are cases where accounting date can accurately be reflected prior to discovery data. The Accounting Date must be submitted in the following format: MM/DD/YYYY. For example, "January 5, 2011," should be "01/05/2011."	Date MM/DD/YYYY
G	Applicable Loss Data Collection Threshold	Report the institution-established loss data collection threshold that was applicable to the respective business line/function and in effect at the time the loss event was captured.	N
H	Gross Loss Amount	Report the total financial impact of the operational loss event before any recoveries and excluding insurance and/or tax effects. The GLA should include all expenses associated with an operational loss event except for opportunity costs, forgone revenue, provision	N

# DRAFT

Field Reference	Field Name	Description	Format N:Numeric C: Character A:Alphanumeric
	(\$USD)	<p>and provision write backs, and costs related to risk management and control enhancements implemented to prevent future operational losses.</p> <p>Also, the following types of events should <b>not</b> be included in the gross loss amount or the institution's completed Schedule:</p> <p><i>Near Misses:</i> An operational risk event that did not result in an actual financial loss or gain to the institution.</p> <p><i>Timing Events:</i> An operational risk event that causes a temporary distortion of the institution's financial statements in a particular financial reporting period but that can be fully corrected when later discovered (e.g., revenue overstatement, accounting and mark-to-market errors).</p> <p><i>Credit Boundary Events:</i> Losses that are related to both operational risk and credit risk. For example, where a loan defaults (credit risk) and the bank discovers that the collateral for the loan was not properly secured (operational risk). [Exception: Retail credit card losses arising from non- contractual third-party initiated fraud (for example, identity theft) should be treated as external fraud operational losses and <b>should be included</b> in the institution's submission.]</p> <p><i>Forgone Revenues/Opportunity Costs:</i> Inability to collect potential future revenues due to operational risk related failures.</p> <p><i>Gains:</i> Situations where an operational risk related failure results in a financial gain for the institution.</p> <p>In addition, Gross Loss Amounts:</p> <p>Should be reported in units of one (not thousands), rounded to the nearest unit (for example, a one million dollar loss would be reported as 1,000,000).</p> <p>Must be reported in \$US dollars. Loss amounts recorded in foreign currency should be converted to \$US dollars using a foreign exchange rate as of the accounting date associated with the respective loss.</p>	

# DRAFT

Field Reference	Field Name	Description	Format N:Numeric C: Character A:Alphanumeric
		Cannot be reported as a negative value, except cases where it represents a decrease in reserves.	
I	Recovery Amount (\$USD)	<p>A recovery is an independent occurrence, related to the original loss event, separate in time, in which funds or outflows of economic benefits are received from a third party, excluding funds received from insurance providers. Recovery Amounts:</p> <ul style="list-style-type: none"> <li>• Should not be included in the Gross Loss Amount column or netted into the gross loss amount.</li> <li>• Should exclude provisions and provision write backs.</li> <li>• Should have the same reference number as the associated loss event.</li> <li>• Should be reported in units of one (not thousands), rounded to the nearest unit (for example, a one million dollar loss would be reported as 1,000,000).</li> <li>• Should be reported in \$US dollars. Recoveries recorded in foreign currency amounts should be converted to \$US dollars using a foreign exchange rate as of the accounting date associated with the respective recovery.</li> <li>• Cannot be reported as a negative value.</li> </ul>	N
J	Basel Event-Type Category: Level 1	All loss events reported by the institution must be mapped to one of the seven “Level 1 Event Types” in Reference Table E.1.a. This field must contain the respective Level 1 Event-Type code specified in Reference Table E.1.a (i.e., ET1, ET2, ET3....ET7). The exact code provided must be used (e.g., “ET1”) with no additional characters or spaces added.	A
K	Basel Event-Type Category: Level 2	If the institution categorizes loss events to the “Level 2 Event-Types” in Reference Table E.1.a, use the Level 2 Event-Type codes specified in Reference Table E.1.a (i.e., ET11 – ET76). If the institution does not map loss events to those Level 2 Event-Types, or cannot map a particular loss event to one of the Level 2 Event-Types contained in Reference Table E.1.a, then “ET00” should be inserted in this field. The exact code provided must be used (e.g., “ET41”) with no additional characters or spaces added.	N
L	Basel Business Line Level 1	All loss events reported by the institution must be mapped to one of the nine “Level 1 Business Lines” in Reference Table E.1.b. This field must contain the specific Level 1 Business Line code identified in Reference Table E.1.b (i.e., BL1, BL2, BL3....BL9) which corresponds to the Level 1 Business Line.	N
M	Basel Business Line Level 2	If the institution categorizes loss events to the “Level 2 Business Lines” (Column L) in Reference Table E.1.b, use the Level 2 Business Line codes specified in Reference Table E.1.b (i.e., BL11 – BL81). If the institution does not map loss events to those Level 2 Business Lines, then insert BL00 in the respective field(s) in this column.	N



# DRAFT

Field Reference	Field Name	Description	Format N:Numeric C: Character A:Alphanumeric
N	Internal Business Line or Corporate Function	Report the institution-specific business line (e.g., Equities) or corporate function (e.g., HR, Finance or Compliance) to which the operational loss event has been assigned. This field should contain a numeric code (i.e., 1, 2, 3...) with each unique internal business line mapped to a unique digit representing that business line/corporate function. The institution should provide this mapping using the schedule provided in Section E.2 ('Internal Business Line').	N
O	Acquired or Merged Entities	If the loss event being reported originated from an acquired or merged entity, then include the name of the respective acquired or merged entity in this field. If not, then insert "NA" (not applicable). "Events originating from acquired or merged entities" refer to loss events that have a capture date prior to the acquisition/merger date. This requirement should also apply to loss events originating from acquired or merged entities that have capture dates after the acquisition/merger date, if those losses have not yet been integrated into the business lines/functions of the merged entity.	C
P	Is Loss Event Included in the Institution's Most Recently Reported Operational Risk Capital Estimate?	If the institution uses statistical model to estimate operational risk capital, enter "Yes" or "No" depending on whether or not the respective loss event is included in the institution's most recently reported operational risk estimate.  If the institution does not estimate operational risk using a statistical model, enter "N/A" for this field.	C Y, N, or N/A
Q	Unit of Measure	The Unit-of-Measure (UOM), established by the institution, to which the loss has been assigned for regulatory and/or economic capital calculation purposes. It is the level at which the BHC's or IHC's or SLHC's quantification model generates a separate distribution for estimating potential operational losses (for example, organizational unit, operational loss event type, risk category, etc.). Some institutions estimate a unique loss distribution for each business line/event type combination while others may estimate scenario loss distributions that span multiple business lines or events types (for example, "Retail Banking/External Fraud"). The UOM field should contain a numeric code (i.e., 1, 2, 3....) that is mapped to a unique UOM. The institution should provide this mapping using the schedule provided in Section E.3 ('Unit-of-Measure').	N
R	Detailed Description of Loss Event (required for events ≥ \$250k)	For all operational loss events with gross loss amounts greater than or equal to \$250 thousand, include a detailed description of the loss event. Generally, the "short-form" descriptions captured in an institutions' internal loss database should suffice.	C

# DRAFT

**Reference Table E.1.a: Level 1 and Level 2 Event-Types**

Level 1 Event-Type Categories		Level 2 Event-Type Categories	
Code	Name	Code	Name
ET1	Internal Fraud	ET11	Unauthorized Activity
		ET12	Theft and Fraud
ET2	External Fraud	ET21	Theft and Fraud
		ET22	Systems Security
ET3	Employment Practices and Workplace Safety	ET31	Employee Relations
		ET32	Safe Environment
		ET33	Diversity & Discrimination
ET4	Clients, Products & Business Practices	ET41	Suitability, Disclosure & Fiduciary
		ET42	Improper Business or Market Practices
		ET43	Product Flaws
		ET44	Selection, Sponsorship & Exposure
		ET45	Advisory Activities
ET5	Damage to Physical Assets	ET51	Disasters and other events
ET6	Business Disruption and System Failures	ET61	Systems
ET7	Execution, Delivery and Process Management	ET71	Transaction, Capture, Execution and Maintenance
		ET72	Monitoring and Reporting
		ET73	Customer Intake and Documentation
		ET74	Customer/Client Account Management
		ET75	Trade Counterparties
		ET76	Vendors & Suppliers
		ET00	Not Applicable
Level 1 Event-Type Categories		Definition	
<i>Internal Fraud</i>		<i>Losses due to acts of a type intended to defraud, misappropriate property or circumvent regulations, the law or company policy, excluding diversity/discrimination events, which involves at least one internal party.</i>	
<i>External Fraud</i>		<i>Losses due to acts of a type intended to defraud, misappropriate property or circumvent the law, by a third party.</i>	
<i>Employment Practices and Workplace Safety</i>		<i>Losses arising from acts inconsistent with employment, health or safety laws or agreements, from payment of personal injury claims, or from diversity/discrimination events.</i>	
<i>Clients, Products &amp; Business Practices</i>		<i>Losses arising from an unintentional or negligent failure to meet a professional obligation to specific clients (including fiduciary and suitability requirements), or from the nature or design of a product.</i>	
<i>Damage to Physical Assets</i>		<i>Losses arising from loss or damage to physical assets from a natural disaster or other events.</i>	
<i>Business Disruption and System Failures</i>		<i>Losses arising from disruption of business or system failures.</i>	
<i>Execution, Delivery and Process Management</i>		<i>Losses from failed transaction processing or process management, from relations with trade counterparties and vendors.</i>	

# DRAFT

Reference Table E.1.b: Level 1 and Level 2 Business Lines

Level 1 Business Lines		Level 2 Business Lines		Activity Groups
Code	Name	Code	Name	
BL1	Corporate Finance	BL11	Corporate Finance	<i>Mergers and acquisitions, underwriting, privatizations, securitization, research, debt (government, high yield), equity, syndications, IPO, secondary private placements</i>
		BL12	Municipal/Government Finance	
		BL13	Merchant Banking	
		BL14	Advisory Services	
BL2	Trading & Sales	BL21	Sales	<i>Fixed income, equity, foreign exchanges, commodities, credit, funding, own position securities, lending and repos, brokerage, debt, prime brokerage</i>
		BL22	Market Making	
		BL23	Proprietary Positions	
		BL24	Treasury	
BL3	Retail Banking	BL31	Retail Banking	<i>Retail lending and deposits, banking services, trust and estates</i>
		BL32	Private Banking	<i>Private lending and deposits, banking services, trust and estates, investment advice</i>
		BL33	Card Services	<i>Merchant/commercial/corporate cards, private labels and retail</i>
BL4	Commercial Banking	BL41	Commercial Banking	<i>Project finance, real estate, export finance, trade finance, factoring, leasing, lending, guarantees, bills of exchange</i>
BL5	Payment and Settlement	BL51	External Clients	<i>Payments and collections, funds transfer, clearing and settlement</i>
BL6	Agency Services	BL61	Custody	<i>Escrow, depository receipts, securities lending (customers) corporate actions</i>
		BL62	Corporate Agency	<i>Issuer and paying agents</i>
		BL63	Corporate Trust	
BL7	Asset Management	BL71	Discretionary Fund Management	<i>Pooled, segregated, retail, institutional, closed, open, private equity</i>
		BL72	Non-Discretionary Fund Management	<i>Pooled, segregated, retail, institutional, closed, open</i>
BL8	Retail Brokerage	BL81	Retail Brokerage	<i>Execution and full service</i>
		BL00	Not Applicable	
BL9	Corporate Level – Non- Business Line Specific	<i>Losses originating from a corporate/firm-wide function that cannot be linked to a specific business line.</i>		

# DRAFT

## E.2. Internal Business Line

<b>Field Name</b>	<b>Description</b>	<b>Format</b> N: Numeric C: Character
Internal Business Line Code	Report the unique numeric code assigned to the respective Internal Business Line by the institution.	N
Internal Business Line Name	Report the name of the Internal Business Line.	C
Internal Business Line Description	Provide a brief description of the Internal Business Line.	C

# DRAFT

## E.3. Unit-of-Measure (UOM)

Field Name	Description	Format N: Numeric C: Character
UOM Code	Report the unique numeric code assigned to the respective Unit-of-Measure by the institution.	N
UOM Name	Report the name of the Unit-of-Measure.	C
UOM Descriptio	Provide additional details on Unit-of-Measure, as necessary.	C

## E.4. Threshold Information

Field Name	Description	Format N: Numeric C: Character
Collection Threshold(s)	Identify all loss data collection thresholds used for the data reported.	N
Applicable Internal Business Line(s)	Identify the "Applicable Internal Business Line(s)" for which the threshold applies. If the same threshold is used for all data reported, indicate "firm-wide" in the Applicable Internal Business Line(s) field.	C
Effective Time Period of Collection Threshold (FROM)	For all collection thresholds applicable to the data reported, identify the time period for which the respective threshold is/was in effect.	Date MM/DD/YY YY
Effective Time Period of Collection Threshold (TO)	For all collection thresholds applicable to the data reported, identify the time period for which the respective threshold is/was in effect.	Date MM/DD/YY YY
Comments	Use as necessary.	C

# DRAFT

## E.5—Legal Reserves Frequency

Report the total number of *outstanding/pending* legal events by Business Line and Event Type for which a legal reserve(s) has been established in accordance with the following instructions.

The total number reported should be based on the number of legal events, **not** the number of “reserve entries.” The total number of outstanding/pending legal events should be reported by the quarter and year in which the first legal reserve for each respective legal event was recorded. For example, a legal event that had three separate reserves recorded in Q1-2011, Q4-2011, and Q2-2012 should be included as one event in the Q1-2011 total.

The Legal Reserves Frequency file should contain the total number of outstanding/pending legal events, for which a legal reserve has been established. The values of losses should also be reported in the FR Y-14Q Operational Loss Data Collection Schedule (E.1) as the event is partially settled. Remaining reserves should not be included in the FR Y-14Q Operational Loss Data Collection Schedule (E.1) until that portion is settled.

Previously reported legal events that have been settled or closed during the current reporting quarter should not be included in the current or future submissions. These events should be detailed as part of the Operational Loss History. Example: A reserve for a legal event was first recorded in Q1-2011. The legal event was then settled in Q2-2012. In this example, the legal event should not be included in the institution’s Q2-2012 Legal Reserve Frequency submission or future Legal Reserve Frequency submissions, but should be included in the firm’s Operational Loss History.

The total number outstanding/pending legal events for which the first legal reserve was recorded on or prior to December 31, 2007 must be reported under “Q4-2007” by Business Line and Event Type in accordance with the following instructions. To clarify, total numbers reported by business line and event type under Q4-2007 should represent the total number of *outstanding/pending* legal events for which a reserve(s) was established prior to December 31, 2007 **and** for which reserves are still in place as of the current reporting quarter.

**Ensure the information provided for each descriptive element conforms to the reporting instructions in the Legal Reserves Frequency Schedule in Section E.5.** For illustrative purposes, an example of a Legal Reserves Frequency Schedule is provided in Reference Table E.5.a.

# DRAFT

## Section E.5. Legal Reserves Frequency Schedule

<b>Field Reference</b>	<b>Field Name</b>	<b>Description</b>	<b>Format</b> N: Numeric C: Character
A	Quarter	Report the quarter in which the first legal reserve was established for a legal event.	C
B	Year	Report the year in which the first legal reserve was established for a legal event.	N
C	Event Type	The number of outstanding/pending legal events reported by the institution must be mapped to one of the seven "Level 1 Event Types" in Reference Table E.1.a. This field must contain the respective Level 1 Event-Type code specified in Reference Table E.1.a (i.e., ET1, ET2, ET3....ET7). The exact code provided must be used (e.g., "ET1") with no additional characters or spaces added.	C
D	Business Line	The number of outstanding/pending legal events reported by the institution must be mapped to one of the nine "Level 1 Business Lines" in Reference Table E.1.b. This field must contain the specific Level 1 Business Line code identified in Reference Table E.1.b (i.e., BL1, BL2, BL3....BL9) which corresponds to the Level 1 Business Line.	C
E	Number of Outstanding/Pending Legal Events	Report the number of outstanding/pending legal events.	N

# DRAFT

Reference Table E.5.a: Example of a Completed Legal Reserves Frequency Schedule  
*(for illustrative purposes only)*

Quarter	Year	Event Type Level 1	Business Line Level 1	Number of Outstanding /Pending Legal Events
Q4	2007	ET4	BL2	4
Q4	2007	ET4	BL7	6
Q4	2007	ET1	BL2	5
Q1	2008	ET4	BL3	1
Q3	2008	ET4	BL2	1
Q2	2009	ET4	BL1	2
Q2	2009	ET3	BL4	1
Q3	2009	ET7	BL2	1
Q3	2010	ET4	BL1	3
Q4	2010	ET7	BL7	1



# DRAFT

## Schedule F—Trading

### A. Purpose of Schedule:

This schedule is designed to capture P/L sensitivities to assets firms hold in their trading books, private equity investments, fair value option (FVO) loan hedges, and certain other assets under fair value accounting. These terms are defined as follows:

**Trading Book** assets are those assets which are reported as trading securities on the FR Y- 9C report, i.e.

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

**Private Equity** includes all equity related investments such as common, preferred, and convertible securities.

This includes investments made on a principal basis in standalone companies, real estate, general and limited partnership interests and hedge funds, including seed capital invested in hedge or mutual funds.

Mandated investments, such as those in government or government sponsored entities and stock exchanges, should be excluded from this schedule.

**FVO Loan hedges** are derivatives used to hedge changes in the fair value of loan assets that are held-for-sale (HFS) or held under fair value option (FVO) accounting, as reported in Schedule H or Schedule J. For example, FVO hedges may include single name or portfolio CDS, interest rate swaps, or any other derivative instrument outside of the trading book used to hedge FVO or HFS loan fair value fluctuations; the definition is not intended to include so-called macro hedges.

**Other Fair Value Assets** are all [non-derivative](#) assets held under fair value option (FVO) accounting except and wholesale and retail loans which should be included in the Schedule H (Wholesale) or Schedule J (FVO/HFS).

Examples would include legacy assets, community development assets and tax-oriented investments, e.g. wind farms. [Derivatives not held for trading do not qualify as other fair value assets for purposes of this schedule, even if they have positive mark-to-market values.](#)

### B. General Instructions:

Please see the Regional Groupings worksheet for definitions of country/currency

# DRAFT

categorizations.

Credit Valuation Adjustments (CVA) should NOT be included in this schedule, while CVA hedges should be reported separately in ~~their~~ own FR Y-14Q Trading schedule. Refer to the definition of submission type in technical submission instructions.

Additionally, X-Valuation Adjustments (XVA) such as Funding Valuation Adjustments (FVA) or other such Valuation Adjustments should NOT be included in this schedule. XVA hedges (other than CVA hedges) should also NOT be reported in the FR Y-14Q Trading schedule or the CVA hedges version thereof.

Positions that are hedges of accrual loans or hedges of loans held under fair value accounting (FVO hedges), but that are not reported on the FR Y-9C Schedule HC-D (Trading Assets and Liabilities), should not be included under the “Trading” submission type for this schedule. Instead, they should be reported as separate instances of Schedule F under the submission types “Accrual Loan Hedges” or “FVO Hedges,” respectively. These categories could include, for example, hedges reported on FR Y-9C Schedules HC-F (Other Assets) or HC-G (Other Liabilities).

~~Similarly, FVO Loan Hedges should be reported separately in its own FR Y-14Q Trading schedule.~~ Refer to the definition of submission type in the technical submission instructions.

Exposures to repurchase agreement positions that are accounted for under the fair value option and any associated hedges should be reported in this schedule.

Neither Mortgage Servicing Rights (MSR's) nor MSR hedges should be included in this schedule.

All worksheets are required to be filled out.

**White cells** represent required inputs. Green cells represent required inputs for parameters that are flexible and can be changed.

**Gray cells** represent calculations or fixed values, and do not need to be completed by the BHC or IHC or SLHC.

Examples of flexible parameters include tenor points and shock %s in some grids. See sheet-specific instructions around acceptable ranges.

Sensitivities related to Exchange Traded Funds (ETFs) that are primarily backed by direct asset holdings should be reported in the appropriate asset class. For example, ETFs that are primarily backed by physical and financial commodities holdings (e.g. XAU) should be included in the Commodities worksheets. Data related to all other ETFs should be reported in the Equity worksheets, except in the case of currency related ETFs. If possible, decompose currency related ETFs into separate currency components and report the related sensitivities in the appropriate currency row of the FX worksheets. If decomposition is not possible, report currency related ETFs in the USD/Other row of the FX worksheets.

## C. Item-Specific Instructions:

Worksheet-specific instructions are included within.

**DRAFT**

# DRAFT

## Glossary

<b>API 2:</b>	The benchmark price reference for coal imported into northwest Europe. It is calculated as an average of the Argus cost-insurance-freight (cif), Antwerp-Rotterdam-Amsterdam (ARA, major coal importing ports in northwest Europe) assessment and McCloskey's northwest European steam coal marker.
<b>API 4:</b>	The benchmark price reference for coal exported out of South Africa's Richards Bay terminal, it is used in physical and over-the-counter (OTC) contracts. Its value is calculated as the average of the Argus freight-on-board (fob) Richards Bay assessment and McCloskey's fob Richards Bay market.
<b>ARS:</b>	Auction Rate Security - Long term, variable rate bonds tied to short term interest rates. ARS have a long term nominal maturity with interest rates reset through a modified Dutch auction, at predetermined short term intervals.
<b>bp:</b>	Basis Point, 1/100th of 1%.
<b>Carry Value:</b>	The amount of an investment as reflected in the consolidated financial statements prepared in accordance with GAAP.
<b>CDS:</b>	Credit Default Swap - A swap designed to transfer the credit exposure of fixed income products between parties. The buyer of the credit swap receives credit protection, whereas the seller of the swap guarantees the credit worthiness of the product.
<b>CER:</b>	Certified Emission Reduction - A type of emissions unit, or carbon credits, issued by the Clean Development Mechanism (CDM) Executive Board for emission reductions.
<b>CMO:</b>	Collateralized Mortgage Obligation - A type of mortgage backed that represent claims to specific cash flows from large pools of home mortgages. The streams of principal and interest payments on the mortgages are distributed to the different classes of CMO interests, known as tranches. Each tranche may have different principal balances, coupon rates, prepayments risks, and maturity dates.
<b>Covered Bond:</b>	A corporate bond with recourse to a pool of assets that secures or "covers" the bond if the originator (usually a financial institution) becomes insolvent.
<b>CS01:</b>	The sensitivity of the portfolio to 1 bp adjustment to credit spreads.
<b>CVA:</b>	Credit Valuation Adjustment - The market value of the credit risk due to any failure of the counterparty to deliver.
<b>Delta:</b>	The expected change in the value of a derivative for each dollar change in the price of the underlying asset.
<b>DV01:</b>	The dollar value (DV) impact on the value of an asset resulting from a one basis point parallel shift downward in interest rates.
<b>EUA/ETS:</b>	European Union Emissions Trading System - Cap and trade emission allowances in the European Union. Companies can buy and sell from each other as needed.
<b>Gamma:</b>	The expected change in delta exposure for a +1% relative change in the price of the underlying entity. Gamma is used to gauge the sensitivity of a derivative position to a price change in the underlying reference security or portfolio. A large positive gamma can serve to magnify gains and cushion losses.
<b>GICS:</b>	Global Industry Classification Standard - An industry taxonomy developed by MSCI and Standard & Poor's for use by the global financial community.
<b>HY:</b>	High Yield - Bonds rated below investment grade (below BBB). Because these bonds have a higher risk of default, they have higher yields than better quality bonds.
<b>IG:</b>	Investment Grade - Bonds that are rated BBB or above.

# DRAFT

<b>iTraxx:</b>	A family of credit default swap index products covering regions of Europe, Australia, Japan and Asia Ex-Japan.
<b>LATAM:</b>	An abbreviation for Latin America.
<b>LCDX:</b>	A North American loan credit default swap index. LCDX consists of 100 reference entities, referencing first lien loans listed on the Markit Syndicated Secured List.
<b>LPG:</b>	Liquefied Petroleum Gas (LPG) is a flammable mixture of hydrocarbon gases used as a fuel in heating appliances and vehicles.
<b>LIBOR:</b>	London Interbank Offered Rate - An interest rate at which banks can borrow funds from other banks in the London interbank market. LIBOR is derived from a filtered average of the world's most creditworthy banks' interbank deposit rates for larger loans with maturities between overnight and one full year.
<b>Lognormal Vega:</b>	The expected change in the value of an option when the option's implied volatility increases by 1%, i.e. goes from 25% to 26%.
<b>MBS:</b>	Mortgage Backed Securities - Debt obligations that represent claims to the cash flows from pools of mortgage loans, most commonly on residential property. Mortgage loans are purchased from banks, mortgage companies, and other originators and then assembled into pools by a governmental, quasi-governmental, or private entities. These entities then issue securities that represent claims on the principal and interest payments made by borrowers on the loans in the pool.
<b>MENA:</b>	An abbreviation for Middle East and North Africa.
<b>MV:</b>	An abbreviation for market value.
<b>Normal Vega</b>	The expected change in the value of an option when the volatility of <b>the security underlying the option</b> increases by 1%, i.e. goes from 25% to 26%.
<b>OAS:</b>	Option Adjusted Spread - A measurement tool for evaluating price differences between similar products with different embedded options. A larger OAS implies a greater return for greater risks.
<b>Private Equity:</b>	Private equity is an asset class consisting of equity securities in operating companies that are not publicly traded on a stock exchange.
<b>TIBOR:</b>	Tokyo Interbank Offered Rate - A daily reference rate based on the interest rates at which banks offer to lend unsecured funds to other banks in the Japanese interbank market.
<b>Unfunded Commitments:</b>	Funds pledged for investment but not yet drawn upon.
<b>Vega:</b>	The expected change in the value of an option when the option's implied volatility increases by 1%, i.e. goes from 25% to 26%. When not specified otherwise, vega denotes lognormal vega as opposed to normal vega.
<b>VER:</b>	Voluntary Emission Reductions/Verified Emission Reductions - A type of carbon offset exchanged in the OTC market for carbon credits.
<b>Vol point:</b>	A 1% absolute change in volatility, e.g. a change from 25% to 26%.
<b>Whole Loan:</b>	A mortgage loan which is sold in its entirety on a standalone basis rather than being pooled with other mortgages.
<b>XO:</b>	XO (Crossover) refers to the CDX.NA.XO CDX index, an index of CDS's that are at the crossover point between investment grade and junk (high yield).

# DRAFT

## Regional Groupings

Advanced Economies	Currency
Andorra	EUR
Australia	AUD
Austria	EUR
Belgium	EUR
Canada	CAD
Channel Islands	GBP
Cyprus	EUR
Denmark	DKK
Estonia	EUR
Finland	EUR
France	EUR
Germany	EUR
Gibraltar	GIP
Greece	EUR
Greenland	DKK
Guam	USD
Guernsey	GGP
Ireland	EUR
Isle of Man	IMP
Italy	EUR
Japan	JPY
Jersey	JEP
Kosovo	EUR
Luxembourg	EUR
Malta	EUR
Monaco	EUR
Montenegro	EUR
Netherlands	EUR
New Zealand	NZD
Norway	NOK
Portugal	EUR
Samoa	USD
San Marino	EUR
Slovakia	EUR
Slovenia	EUR
Spain	EUR
Sweden	SEK
Switzerland	CHF
United Kingdom	GBP
United States	USD
Vatican City	EUR
Virgin Islands (US)	USD
Virgin Islands (British)	USD

Emerging Europe	Currency
Albania	ALL
Belarus	BYR
Bosnia and Herzegovina	BAM
Bulgaria	BGL
Croatia	HRK
Czech Republic	CZK
Hungary	HUF
Iceland	ISK
Latvia	LVL
Liechtenstein	CHF
Lithuania	LTL
Macedonia	MKD
Moldova	MDL
Poland	PLN
Romania	ROL
Russia	RUB
Serbia	RSD
Ukraine	UAH

Latin America & Caribbean	Currency
Antigua and Barbuda	XCD
Argentina	ARS
Aruba	AWG
Bahamas	BSD
Barbados	BBD
Belize	BZD
Bermuda	BMD
Bolivia	BOB
Brazil	BRL
Cayman Islands	KYD
Chile	CLP
Colombia	COP
Costa Rica	CRC
Cuba	CUP
Dominica	XCD
Dominican Republic	DOP
Ecuador	ECS
El Salvador	USD
Grenada	XCD
Guatemala	GTQ
Guyana	GYD
Haiti	HTG
Honduras	HNL
Jamaica	JMD
Mexico	MXN
Nicaragua	NIO
Panama	PAB
Paraguay	PYG
Peru	PEN
Saint Kitts and Nevis	XCD
Saint Lucia	XCD
Saint Vincent and the Grenadines	XCD
Suriname	SRG
Trinidad and Tobago	TTD
Uruguay	UYU
Venezuela	VEF

# DRAFT

Asia Ex-Japan	Currency
Bangladesh	BDT
Bhutan	BTN
Brunei	BND
Cambodia	KHR
China	CNY
Fiji	FJD
Hong Kong	HKD
India	INR
Indonesia	IDR
Kazakhstan	KZT
Kyrgyzstan	KGS
Laos	LAK
Macau	MOP
Malaysia	MYR
Maldives	MVR
Mongolia	MNT
Myanmar	MMK
Nepal	NPR
North Korea	KPW
Philippines	PHP
Singapore	SGD
Solomon Islands	SBD
South Korea	KRW
Sri Lanka	LKR
Taiwan	TWD
Tajikistan	TJR
Thailand	THB
Tonga	TOP
Turkmenistan	TMM
Uzbekistan	UZS
Vanuatu	VUV
Vietnam	VND

Middle East & North Africa	Currency
Afghanistan	AFA
Algeria	DZD
Armenia	AMD
Azerbaijan	AZM
Bahrain	BHD
Dubai	AED
Egypt	EGP
Georgia	GEL
Iran	IRR
Iraq	IQD
Israel	ILS
Jordan	JOD
Kuwait	KWD
Lebanon	LBP
Libya	LYD
Morocco	MAD
Oman	OMR
Pakistan	PKR
Qatar	QAR
Saudi Arabia	SAR
Somalia	SOS
Syria	SYP
Tunisia	TND
Turkey	TRY
United Arab Emirates	AED
Yemen	YER

Sub-Saharan Africa	Currency
Angola	AOA
Benin	XOF
Botswana	BWP
Burkina Faso	XOF
Burundi	BIF
Cameroon	XAF
Cape Verde	CVE
Central African Republic	XAF
Chad	XAF
Congo-Brazzaville	XAF
Comoros	KMF
Cote d'Ivoire	XOF
Democratic Republic of the Congo	CDF
Djibouti	DJF
Equatorial Guinea	GQE
Eritrea	ERN
Ethiopia	ETB
Gabon	XAF
Gambia	GMD
Ghana	GHC
Guinea	GNF
Guinea-Bissau	XOF
Kenya	KES
Lesotho	LSL
Liberia	LRD
Madagascar	MGF
Malawi	MWK
Mali	XOF
Mauritania	MRO
Mauritius	MUR
Mozambique	MZM
Namibia	NAD
Niger	XOF
Nigeria	NGN
Republic of the Congo	XAF
Rwanda	RWF
Senegal	XOF
Seychelles	SCR
Sierra Leone	SLL
South Africa	ZAR
Sudan	SDG
Swaziland	SZL
Tanzania	TZS
Togo	XOF
Uganda	UGX
Zambia	ZMK
Zimbabwe	USD

# DRAFT

## F.1—Equity by Geography

### **General Instructions**

For definitions of the "Other" categories in each section, reference the Regional Groupings worksheet. For example, "Other Advanced Economies" would include entries for any Advanced Economy country (as defined on the Regional Groupings worksheet) that is not explicitly listed in the Advanced Economies section of this worksheet. This Other Advanced Economies row would also include aggregated exposures from explicitly listed countries where the exposures fall below minimal thresholds specified below.

Note that each regional section has a row for cross-country indices, e.g. the Euro Stoxx indices, which may be used if firms have difficulty decomposing sensitivities by country.

**Vega should be reported in absolute terms (\$MM / +1 vol point) regardless of whether relative or absolute vols were provided on the Equity Spot-Vol Grids worksheet.**

### **Profit/(Loss) Calculation**

Profit/(Loss) should be calculated assuming full revaluation where possible. In completing the Profit/(Loss) section, firms should run full revaluations assuming all equities move a given relative % and then allocate the resulting P/L by country/index.

For example, all entries in the -50% decline column would be calculated by running a single full-revaluation simulation in which all equities decline by -50% regardless of geography. P/L from this single simulation would then be allocated among the various rows corresponding to different countries/indices.

### **Thresholds**

Sensitivities for countries in **Advanced Economies** for which the delta is less than \$3mm may be aggregated and entered as a single entry on the "Other Advanced Economies" row. For **other regions**, sensitivities for which the delta is less than \$2mm may be aggregated and entered in the appropriate "Other" row for that region.

### **Spot Shocks**

The spot shocks listed in the green cells may be modified to fit what the firm has available subject to the following constraints:

Spot shocks must at a minimum span 0% to -50% and at least 5 distinct spot shocks less than 0% must be provided.

The difference between adjacent spot shocks must not exceed 25%.

Additional columns for other shock percent may be added. Unused columns should be left blank.

### **Tenors**

In the term structure section, please replace the tenor points shown in green with those the firm has available. Insert additional term structure columns as needed. Unused columns should be left blank.



# DRAFT

## F.2—Equity Spot-Vol Grid

### General Instructions

Each point on the grid should be calculated using full revaluation and should represent firm-wide Profit/(Loss) results.

Vega post spot shock must be provided in absolute terms (units of \$MM / +1 vol point) even if the spot-vol grid is populated using relative volatility shocks.

Additional rows and columns for other shock values may be added. Unused rows/columns should be left blank.

### Spot Shocks

The spot shocks provided must match those provided on the Equity by Geography worksheet and are subject to the constraints outlined on that worksheet.

### Volatility Shocks

The volatility shocks listed in the green cells may be modified subject to the following constraints: Vol shocks must go out to at least +20 vol points (or an equivalent amount if using a relative methodology).

**If using relative volatility shocks, it may be necessary to modify the default volatility shocks shown in the grid based on the level of the volatility surface on the effective date of this submission.** Firms must provide at least 3 absolute volatility shocks which are greater than zero.

### Absolute Vol Shocks

When shocking spot, "sticky" (i.e., fixed) strike volatility must be kept constant. The implied volatility at each strike should not change and the volatility curve within a given tenor should remain unchanged (in terms of sticky / fixed strike vs. absolute volatility). This is illustrated as we go from Table 1 to Table 2, below.

When shocking implied volatility within a given tenor, the absolute implied volatility at each strike (of each option at each strike) should be shocked in a parallel manner by the same absolute amount. This is illustrated as we go from Table 2 to Table 3.

Table 1:		Table 2:		Table 3:	
Spot Shock: 0%		Spot Shock: -30%		Spot Shock: -30%, Vol Shock: +10 pts	
<u>Strike</u>	<u>Implied Vol</u>	<u>Strike</u>	<u>Implied Vol</u>	<u>Strike</u>	<u>Implied Vol</u>
700	32	700	32	700	42
800	27	800	27	800	37
900	23	900	23	900	33
1000	20	<b>1000</b>	<b>20</b>	<b>1000</b>	<b>30</b>

### Relative Vol Shocks

Firms applying relative volatility shocks would keep their volatility surface fixed in going from Table 1 to Table 2. That is, the implied volatility given a -30% shock would be what the implied volatility was before shocking spot by -30%.

# DRAFT

## **F.3—Other Equity**

### **General Instructions**

Entries in the dividend table above should represent the Profit/(Loss) in \$MM that the firm would experience if dividend yields in the specified tenors were to decline by -1% in relative terms, i.e. drop from 3% to 2.97%.

For a precise description of what countries constitute Europe, please refer to the UN GeoScheme: (<http://millenniumindicators.un.org/unsd/methods/m49/m49regin.htm#Europe>).

### **Tenors**

In the term structure section, replace the tenor points shown in green with those the firm has available. Insert additional term structure columns as needed. Unused columns should be left blank. The unspecified tenor column is to be used only if the firm is unable to break out its sensitivities by tenor.

# DRAFT

## **F.4—FX Spot Sensitivities**

### **General Instructions**

Enter currency symbols into the green cells of the Currency1 and Currency2 columns. Additional rows may be inserted into this section as needed. Any unused rows should be left blank.

Report on-shore and off-shore currency sensitivities separately.

For non-USD currency pairs:

1) Delta is defined as USD delta equivalent of Currency1, with a positive number indicating long Currency1 / short Currency2, and a negative number indicating short Currency1 / long Currency2.

2) If the currency delta positions are netted and shown only versus USD, then enter zero for delta and show the P/L arising from gamma only in the corresponding currency pair row.

### **Profit/(Loss) Calculation**

Profit/(Loss) should be calculated assuming full revaluation where possible. In completing the Profit/(Loss) section, firms should complete each row independently. For example, a row for EUR vs. USD would be calculated by shocking only the EUR vs. USD exchange rate and leaving all other exchange rates fixed.

### **Thresholds**

Entries for currencies where the absolute value of the delta is below \$50mm and where no grid P/L entries have an absolute value above \$10mm may be aggregated and placed into the OTHER vs. USD line.

### **Spot Shocks**

The spot shocks listed in the green cells may be modified to fit what the firm has available subject to the following constraints:

Spot shocks must at a minimum span -30% to +30% and at least four distinct spot shocks on each side of 0% must be provided.

The difference between adjacent spot shocks must not exceed 10%.

Additional columns for other shock percent may be added. Unused columns should be left blank.

In computing the Profit/(Loss) entries, assume normal volatility does not change.

# DRAFT

## F.5—FX Vega

### **General Instructions**

Enter currency symbols into the green cells of the Currency1 and Currency2 columns. Additional rows may be inserted as needed. Unused rows should be left blank.

Report on-shore and off-shore currency sensitivities separately.

### **Thresholds**

Enter all currency pairs for which the absolute value of the vega **at any tenor (or in total)** exceeds \$1 mm / +1 vol point; pairs with smaller vegas may be omitted.

### **Tenors**

In the term structure section, replace the tenor points shown in green with those the firm has available. Insert additional term structure columns as needed. Unused columns should be left blank.

# DRAFT

## F.6—Rates DV01

### General Instructions

For definitions of the "Other" categories in each section, reference the Regional Groupings worksheet. For example, "Other Asia Ex-Japan" would include entries for any Asia Ex-Japan currency (as defined on the Regional Groupings worksheet) that is not explicitly listed in the Asia Ex-Japan section of this worksheet. This Other Asia Ex-Japan row would also include aggregated exposures from explicitly listed currencies where the exposures fall below minimal thresholds specified below.

**\*\*DV01s of instruments shocked by market value (MV) such as securitized products, ARS, Loans and defaulted securities must be entered in aggregate on the "Instruments shocked by Market Value" row for the appropriate currency. For the regional sections (Other Advanced Economies, Emerging Europe, Latin America & Caribbean, etc.), DV01s of instruments shocked by MV should not be included to avoid double counting.**

**Entries on this sheet should include ALL products with interest rate sensitivities including those such as munis, agencies and ARS for which DV01s are also requested elsewhere in this schedule.**

DV01 for Corporates and Agency MBS should be included in the Swaps / Discounting Curve line for the appropriate currency, while DV01 for Agency indentures/bonds should be reported in the Agencies line for the appropriate currency. If the OIS curve is used as the discounting curve, report the sensitivities associated with changes in the OIS curve in the Swaps/Discounting Curve rows.

### Examples

**Example 1:** Consider a 5 year receive fixed swap versus 6-month LIBOR, where the standard curve is 3 month LIBOR. The DV01 of the fixed side and the first fixing would appear in the **Swaps / Discounting Curve row as a positive directional risk number**. The DV01 of the 0.5Y by 5Y year basis swap would appear in the 6m row as a positive number as well since a 1 bp drop in that curve would be beneficial. Note that this would correspond to a -1 bp change in  $x$ , where  $x$  is the spread in the 6m vs. 3m +  $x$  basis swap.

**Example 2:** 3 year basis swap in which the bank pays 1m LIBOR + 10 bps vs. 3m LIBOR, where the standard curve is 3 month LIBOR. The initial 1m and 3m fixings would appear in the **Swaps / Discounting Curve line as a directional risk number**. The remaining 1m by 3Y basis swap would appear in the 1m line as a positive number. Note that this would correspond to a +1 bp change in  $x$ , where  $x$  is the spread in the 3m vs. 1m +  $x$  basis swap.

### Sovereign Bonds

Sovereign bonds issued in the same currency as the reference sovereign's base currency should have their DV01's entered on this worksheet. Examples would include U.S. government bonds denominated in USD and U.K. government bonds denominated in GBP. Such instruments would not lead to any credit spread entries on the Sovereign Credit worksheet, though they would lead to entries in the MV (A) and Notional (B) sections of that worksheet.

Euro-denominated bond positions issued by countries using the euro should also be entered on this

# DRAFT

worksheet only. Note that there are specific rows for "Government" exposures for those countries defined as "Advanced Economies" on the Regional Groupings worksheet. For other countries, the government exposures would be summed with other types of rates exposures and entered in aggregate in the single row for the corresponding country. So, for example, Spanish government bonds would be entered on this worksheet on the row in the "EUR Directional Risks" section labeled "Governments: Spain", while Hungarian government bond exposures would be aggregated along with any other Hungarian rates exposures and entered in the row labeled "HUF". Again, such instruments would not lead to any credit spread entries on the Sovereign Credit worksheet, though they would lead to entries in the MV (A) and Notional (B) sections of that worksheet.

In the case of sovereign bonds issued in a currency that differs from the reference sovereign's base currency, the rates risk should be entered on this worksheet, while the corresponding credit risk should be entered on the Sovereign Credit worksheet. Examples would include Japanese government bonds denominated in USD and U.K. government bonds denominated in EUR.

Any rates exposure from Sovereign CDS should be entered on this worksheet, while the corresponding credit risk should be entered on the Sovereign Credit worksheet.

These instructions with respect to sovereign bonds pertain solely to the entries on this worksheet. Please see the instructions on the Sovereign Credit worksheet when entering the notionals and market values there.

## **Profit/(Loss) Section**

The shock entries listed in the green cells may be modified to fit what the firm has readily available. Shock levels should range from -200 bps to +500 bps and the difference between adjacent shocks should not exceed 100 bps.

Additional columns for other shock percent may be added. Unused columns should be left blank.

When calculating the Profit/(Loss) from negative rate shocks, if the firm's systems cannot accommodate negative rate levels, floor rates at +1bp (i.e. assume rates cannot become negative).

**In computing Profit/(Loss), assume normal (absolute) volatility does not change and, to the extent possible, preserve the skew by strike for all shock levels.**

**Do not include instruments shocked by market value (MV) in computing the Profit/(Loss) points.**

## **Tenors**

In the term structure section, replace the tenor points shown in green with those the firm has available. Insert additional term structure columns as needed. Unused columns should be left blank.

# DRAFT

## F.7—Rates Vega

### **General Instructions**

For definitions of the "Other" categories in each section, reference the Regional Groupings worksheet. For example, the "Other Advanced Economies" section should include entries for any Advanced Economy country (as defined on the Regional Groupings worksheet), when the currency is not explicitly listed on this worksheet.

Similarly, the Totals sections, such as Total Emerging Europe, should contain the summation of the vegas across all the currencies when issuing countries are defined as Emerging Europe on the Regional Groupings worksheet.

Specify in the green cells at the top of the worksheet whether the vegas provided are normal or lognormal and whether the units are \$MM / +10% relative move or \$MM / +10 bps absolute move.

### **Tenors**

In the term structure section, replace the tenor points shown in green with those the firm has available. Insert additional term structure rows and columns as needed. Unused rows and columns should be left blank.

# DRAFT

## F.8—Other Rates

### **General Instructions**

Cross-Currency vs. USD basis is defined as USD vs. CCY + x Basis Swap (\$K).

### **Tenors**

In the term structure section, replace the tenor points shown in green with those the firm has available. Insert additional term structure columns as needed. Unused columns should be left blank.



# DRAFT

## F.9—Energy

### General Instructions

Delta for commodities is defined as dollarized delta exposure in (\$MM).

"Total Gamma" is the unweighted sum of gammas across all tenors for each product. Similarly, "Total Vega" is the unweighted sum of the vegas across all tenors for each product.

**Vega may be reported in absolute (\$MM / +1 vol point) or relative (\$MM / +10% Rel) terms regardless of whether relative or absolute vols are provided on the Commodity Spot-Vol Grids worksheet, but should be consistent across the Energy, Metals, Ags & Softs and Commodity Indices worksheets. The appropriate vega units may be selected from the list provided in the Vega title cell.**

Ideally, storage and other models, which do not qualify for derivatives accounting treatment, should be excluded from this schedule while the underlying (exposure and P/L contribution) should be included. In cases where such exclusion is computationally difficult due to system constraints, firms may include the impacts of storage and other models provided it is immaterial (i.e., the absolute value of the incremental P/L contributed by the model at both spot up +75% and spot down -75% are both <\$50mm).

BHCs, IHCs and SLHCs should decompose the commodities sensitivities of complex products into their constituent product sensitivities wherever possible. The column for **Structured Products** is meant to capture commodity exposures that are not easily decomposed into their underlying components. Examples include structured notes linked to commodity baskets and custom indices.

### Tenors

The maturities/maturity buckets in column B may be modified to fit what the firm has available and all should be considered as relative to the effective date of this submission. Please provide monthly data for the first 12 months. Maturities greater than 12 months but less than 10 years from the effective date must be supplied on a monthly, quarterly or annual basis. Maturities greater than 10 Years from the effective date may be grouped together.

### Informational section

**The columns in the "Informational" section are meant to be SUBSETS of the total exposures entered in the other columns to the left of the "Total Energy" column.** Additional informational columns (e.g. Coal, Emissions, etc.) may be inserted if desired.

# DRAFT

## F.10—Metals

### General Instructions

Delta for commodities is defined as dollarized delta exposure in (\$MM).

"Total Gamma" is the unweighted sum of gammas across all tenors for each product. Similarly, "Total Vega" is the unweighted sum of the vegas across all tenors for each product.

**Vega may be reported in absolute (\$MM / +1 vol point) or relative (\$MM / +10% Rel) terms regardless of whether relative or absolute vols are provided on the Commodity Spot-Vol Grids worksheet, but should be consistent across the Energy, Metals, Ags & Softs and Commodity Indices worksheets. The appropriate vega units may be selected from the list provided in the Vega title cell of the Energy worksheet.**

Ideally, storage and other models, which do not qualify for derivatives accounting treatment, should be excluded from this schedule while the underlying (exposure and P/L contribution) should be included. In cases where such exclusion is computationally difficult due to system constraints, firms may include the impacts of storage and other models provided it is immaterial (i.e., the absolute value of the incremental P/L contributed by the model at both spot up +75% and spot down -75% are both <\$50mm).

### Tenors

The maturities/maturity buckets in column B may be modified to fit what the firm has available and all should be considered as relative to the effective date of this submission. Please provide monthly data for the first 12 months. Maturities greater than 12 months but less than 10 years from the effective date must be supplied on a monthly, quarterly or annual basis. Maturities greater than 10 years from the effective date may be grouped together.

# DRAFT

## F.11—Ags & Softs

### General Instructions

Delta for commodities is defined as dollarized delta exposure in (\$MM).

"Total Gamma" is the unweighted sum of gammas across all tenors for each product. Similarly, "Total Vega" is the unweighted sum of the vegas across all tenors for each product.

**Vega may be reported in absolute (\$MM / +1 vol point) or relative (\$MM / +10% Rel) terms regardless of whether relative or absolute vols are provided on the Commodity Spot-Vol Grids worksheet, but should be consistent across the Energy, Metals, Ags & Softs and Commodity Indices worksheets. The appropriate vega units may be selected from the list provided in the Vega title cell of the Energy worksheet.**

Ideally, storage and other models, which do not qualify for derivatives accounting treatment, should be excluded from this schedule while the underlying (exposure and P/L contribution) should be included. In cases where such exclusion is computationally difficult due to system constraints, firms may include the impacts of storage and other models provided it is immaterial (i.e., the absolute value of the incremental P/L contributed by the model at both spot up +75% and spot down -75% are both <\$50mm).

### Tenors

The maturities/maturity buckets in column B may be modified to fit what the firm has available and all should be considered as relative to the effective date of this submission. Provide monthly data for the first 12 months. Maturities greater than 12 months but less than 10 years from the effective date must be supplied on a monthly, quarterly or annual basis. Maturities greater than 10 years from the effective date may be grouped together.

# DRAFT

## F.12—Commodity Indices

### General Instructions

Delta for commodities is defined as dollarized delta exposure in (\$MM).

"Total Gamma" is the unweighted sum of gammas across all tenors for each product. Similarly, "Total Vega" is the unweighted sum of the vegas across all tenors for each product.

**Vega may be reported in absolute (\$MM / +1 vol point) or relative (\$MM / +10% Rel) terms regardless of whether relative or absolute vols are provided on the Commodity Spot-Vol Grids worksheet, but should be consistent across the Energy, Metals, Ags & Softs and Commodity Indices worksheets. The appropriate vega units may be selected from the list provided in the Vega title cell of the Energy worksheet.**

Ideally, storage and other models, which do not qualify for derivatives accounting treatment, should be excluded from this schedule while the underlying (exposure and P/L contribution) should be included. In cases where such exclusion is computationally difficult due to system constraints, firms may include the impacts of storage and other models provided it is immaterial (i.e., the absolute value of the incremental P/L contributed by the model at both spot up +75% and spot down -75% are both <\$50mm).

Firms should decompose their exposures to diversified commodity indices into their individual constituents and enter them on the Energy, Metals and Ags & Softs worksheets to the extent possible. Any residual exposures to diversified commodity indices should be entered on this worksheet.

The column for Long/Short Commodity Indices is meant to capture exposures to indices that do not contain outright commodity exposures but instead seek to generate alpha through long/short commodity strategies.

### Tenors

The maturities/maturity buckets in column B may be modified to fit what the firm has available and all should be considered as relative to the effective date of this submission. Provide monthly data for the first 12 months. Maturities greater than 12 months but less than 10 years from the effective date must be supplied on a monthly, quarterly or annual basis. Maturities greater than 10 years from the effective date may be grouped together.

# DRAFT

## F.13—Commodity Spot-Vol Grids

### General Instructions

Please use full revaluation, if possible, in calculating the grid entries.

Ideally storage and other models which do not qualify for derivatives accounting treatment should be excluded from this schedule while the underlying (exposure and P/L contribution) should be included. In cases where such exclusion is computationally difficult due to system constraints, firms may include the impacts of storage and other models provided it is immaterial (i.e. the absolute value of the incremental P/L contributed by the model at both spot up +75% and spot down -75% are both <\$50mm).

In calculating the grid entries, shock the entire vol surface by the specified vol shock and shock all spot prices by the specified spot shock. Recalculate the value of all options under these conditions and compute the change in market value relative to current market value. This change in market value is what should be entered in the appropriate grid cells.

### Diversified Commodity Indices:

The grid for Diversified Commodity Indices should correspond to those exposures listed on the Commodity Indices worksheet. It should not include the impact from diversified index exposures which were decomposed and entered into other columns on the Energy, Metals or Ags & Softs worksheets. The impact from these decomposed index positions should be factored into the other spot-vol grids on this page. Firm choosing to decompose all diversified commodity index exposures into their components would leave the Spot-Vol grid for Diversified Commodity Indices blank.

Long/Short Index exposures (detailed on the Commodity Indices worksheet) should be excluded from the Spot-Vol grids.

### Spot/Volatility Shocks:

The specific spot and vol shocks chosen need not be the same across each of the commodity grids.

Rows and columns for additional shock values may be added. Unused rows or columns should be left blank.

Vol shocks may be specified as either absolute moves in vol points or as a relative (%) change in volatility.

Indicate in the green cells above each grid which volatility units are being provided.

The spot and volatility shocks listed in the green cells may be modified to fit what the firm has readily available subject to the following constraints:

**Spot shocks must at a minimum span -75% to +75%. At least 5 distinct spot shocks less than 0% and 3 distinct spot shocks greater than 0% must be provided.**

**The difference between adjacent spot shocks must not exceed 25%.**

**If volatility shocks are specified in terms of absolute moves, volatility shocks must span at least 0 to +50 vol pts. At least 4 distinct volatility shocks greater than 0 must be provided and adjacent shocks must be no more than 15 vol points apart.**

# DRAFT

**If volatility shocks are specified in terms of relative (%) moves, then the guidance above must be converted to relative space using the at the money spot volatilities on the effective date of this submission.**

# DRAFT

## **F.14—Securitized Products**

Notional **and** MV amounts should be reported, by rating and vintage, for all relevant products.

\* MV for CDS should be reported as the notional amount plus the current MTM of the CDS, i.e. the bond-equivalent market value of the CDS. The notional amount should be positive for cases where CDS protection has been sold (long underlying bond) and negative for cases where CDS protection has been bought (short underlying bond).

Ratings information reflects current rating and not original rating.

Vintage is defined as the difference between the effective date of the submission and the issue date (securities) or effective date (loans or derivatives). If vintage information for a given product is not available, please enter exposures (MV and notional) in the unspecified vintage bucket for the appropriate rating.

Agency loans that are in forward contract should be included on the Agencies worksheet, otherwise they should be entered here under Whole Loans.

Warehouse should only include exposure to which there is first loss protection provided. Otherwise, all residential whole loans and commercial real estate whole loans used for trading or warehoused without first loss protection should be included in the respective whole loan categories. For CLO Warehouse exposures, the traded amount should be reported.

The Total Protection column should contain the total first loss protection that is applicable to the firm's warehouse exposures. The reported first loss protection can be in the form of cash or assets. Firms should specify in their supporting documentation how much of this protection is in the form of cash vs. assets.

A category for European RMBS is provided. European ABS and CMBS exposures should not be included in this column, but instead entered in the existing ABS and CMBS sections of this worksheet.

# DRAFT

## F.15—Agencies

General:

The top section above should contain sensitivities for US Agency securities only.

The lower section should contain sensitivities for non-US Agencies **without** an explicit sovereign government guarantee. This includes bonds as well as CDS.

Non-US Agency securities that do have an explicit government guarantee should **not** be entered here. They should be treated as government bonds and entered on the Rates DV01 worksheet and/or the Sovereign Credit worksheets in accordance with the instructions on those pages.

Loans should be included on this worksheet only if they are in forward contract or if the loans have FHA IDs and are in process of being reviewed for FHA insurance. Otherwise, the loans should be entered on the Securitized Products worksheet under Whole Loans.

Note that the spread sensitivities here refer to Option Adjusted Spread (OAS).

### **Spread Shocks:**

The spread widenings listed in the green cells may be modified to fit what the firm has readily available subject to the following constraints:

OAS shocks must at a minimum range from 100 bps to at least 400 bps and at least 4 distinct spot shocks greater than 1 bp must be provided.

Additional columns for other shock levels may be added. Unused columns should be left blank.



# DRAFT

## F.16—Munis

### **General:**

\* MV for CDS should be reported as the notional amount plus the current MTM of the CDS, i.e. the bond-equivalent market value of the CDS. The notional amount should be positive for cases where CDS protection has been sold (long underlying bond) and negative for cases where CDS protection has been bought (short underlying bond).

The <B rating bucket for each section is broken into 3 categories - one for defaulted securities, one for non-defaulted securities, and one for "Default Status Unknown". The "Defaulted" category is meant to capture (1) defaulted positions and (2) for Bonds, Single Name CDS and Other/Unspecified categories, positions that do not have associated credit spread sensitivities, e.g. distressed positions or positions for which credit spread sensitivities are not available, regardless of rating. The "Default Status Unknown" row is meant to be used only when firms do not have the ability to categorize a given security as being defaulted or not.

Note that no credit widening sensitivities are requested for <B defaulted securities.

This worksheet should contain exposures to all Municipals, regardless of geography and currency.

Municipals refer to local government entities that do not have an explicit guarantee from the sovereign central government. Issuers with an explicit sovereign guarantee should be treated as government bonds and entered on either the Rates DV01 and/or the Sovereign Credit worksheet.

### **Profit/(Loss) Calculation:**

Profit/(Loss) should be calculated assuming full revaluation where possible. In completing the Profit/(Loss) section, firms should run full revaluations assuming all credit spreads (across all geographies and products- Munis, Corporates, CDS, etc.) move a given amount and then allocate the resulting P/L to the various rows and sections across all credit worksheets.

For example, firms should run a single full-revaluation simulation in which all spreads widen by 100% regardless of geography/product. P/L from this single simulation would then be allocated among the various rows and worksheets corresponding to different products, countries and indices.

### **Spread Shocks:**

Profit/(Loss) from spread widenings should be entered using either the relative (%) section or the absolute (bps) section, but not in both.

Columns for additional slide points may be inserted, however **do not remove or modify any of the existing slide points shown in gray.**

### **Tenors:**

In the term structure section, replace the tenor points shown in green with those the firm has available.

Insert additional term structure rows as needed. Unused rows should be left blank.

**DRAFT**

# DRAFT

## **F.17—Auction Rate Securities (ARS)**

### **General:**

This worksheet is meant to collect basic sensitivities related to Auction Rate Securities (ARS).

### **Tenors:**

In the term structure section, replace the tenor points shown in green with those the firm has available.

Insert additional term structure rows as needed. Unused rows should be left blank.

# DRAFT

## **F.18—Corporate Credit-Advanced**

### **General:**

Reference the Regional Groupings worksheet for the definition of which countries are included in Advanced Economies.

Notional **and** MV amounts should be reported, by rating and tenor, for all relevant products.

\* MV for CDS should be reported as the notional amount plus the current MTM of the CDS, i.e. the bond-equivalent market value of the CDS. The notional amount should be positive for cases where CDS protection has been sold (long underlying bond) and negative for cases where CDS protection has been bought (short underlying bond).

"On-the-Run" refers to the two most recent series (i.e. the current and the prior) of the index.

The <B rating bucket for each section is broken into 3 categories - one for defaulted securities, one for non-defaulted securities, and one for "Default Status Unknown". The "Defaulted" category is meant to capture (1) defaulted positions and (2) for Bonds, Single Name CDS, Covered Bonds and Other/Unspecified categories, positions that do not have associated credit spread sensitivities, e.g. distressed positions or positions for which credit spread sensitivities are not available, regardless of rating. The "Default Status Unknown" row is meant to be used only when firms do not have the ability to categorize a given security as being defaulted or not.

Note that no credit widening sensitivities are requested for <B defaulted securities.

The CDX Other and Itraxx Other categories are meant to capture exposures to indices that are not explicitly listed in the 'Corporate Credit-Advanced' tab. For example, CDX HiVol exposures should be reported under the "CDX Other" category and Itraxx HiVol exposures should be reported in the "Itraxx Other" category.

For Index Options, report exposure by tenor based on the maturity of the option and not that of the underlying.

### **Decomposition:**

Bespoke CDOs and Credit Baskets should be decomposed and included by rating on the appropriate Corporate Credit worksheet under the section for "Single Name CDS".

Indices, Index Tranches and Index Options SHOULD NOT BE DECOMPOSED. They should be included by category (IG, HY, Loan Index) in the Indices & Index Tranches and the Index Options sections.

### **Profit/(Loss) Calculation:**

Profit/(Loss) should be calculated assuming full revaluation where possible. In completing the Profit/(Loss) section, firms should run full revaluations assuming all credit spreads (across all geographies and products- Munis, Corporates, CDS, etc.) move a given amount and then allocate the resulting P/L to the various rows and sections across all credit worksheets.

For example, firms should run a single full-revaluation simulation in which all spreads widen by 100% regardless of geography/product. P/L from this single simulation would then be allocated among the various rows and worksheets corresponding to different products, countries and

# DRAFT

indices.

## **Spread Shocks:**

Profit/(Loss) from spread widenings should be entered using either the relative (%) section or the absolute (bps) section, but not in both.

The spread widenings listed in the green cells may be modified to fit what the firm has readily available subject to the following constraints:

### **If using relative (%) widenings:**

**The 50%, 100% and 200% widenings are required. At least one widening must be 400% or greater.**

**At least 3 widenings greater than 200% must be provided and no two adjacent widening %'s may be more than 100% apart.**

### **If using absolute (bps) widenings:**

**The +50 bps, +100 bps, +500 bps and +1000 bps widenings are required. At least one widening must be +2500 bps or greater.**

**At least 3 additional widenings above +1000 bps must be provided. These must be spaced such that no two adjacent widenings are more than 1000 bps apart.**

**Note that the guidance in absolute space is necessarily a function of spread levels on the effective date and therefore subject to change. Firms are strongly encouraged to provide relative (%) spread sensitivities.**

# DRAFT

## **F.19—Corporate Credit-Emerging Markets**

### **General:**

Emerging Markets encompasses all countries not defined as Advanced Economies on the Regional Groupings worksheet.

Notional **and** MV amounts should be reported, by rating and tenor, for all relevant products.

\* MV for CDS should be reported as the notional amount plus the current MTM of the CDS, i.e. the bond-equivalent market value of the CDS. The notional amount should be positive for cases where CDS protection has been sold (long underlying bond) and negative for cases where CDS protection has been bought (short underlying bond).

"On-the-Run" refers to the two most recent series (i.e. the current and the prior) of the inde

The <B rating bucket for each section is broken into 3 categories - one for defaulted securities, one for non-defaulted securities, and one for "Default Status Unknown". The "Defaulted" category is meant to capture (1) defaulted positions and (2) for Bonds, Single Name CDS, Covered Bonds and Other/Unspecified categories, positions that do not have associated credit spread sensitivities, e.g. distressed positions or positions for which credit spread sensitivities are not available, regardless of rating. The "Default Status Unknown" row is meant to be used only when firms do not have the ability to categorize a given security as being defaulted or not.

Note that no credit widening sensitivities are requested for <B defaulted securities.

For Index Options, report exposure by tenor based on the maturity of the option and not that of the underlying.

### **Decomposition:**

Bespoke CDOs and Credit Baskets should be decomposed and included by rating on the appropriate Corporate Credit worksheet under the section for "Single Name CDS".

Indices, Index Tranches and Index Options SHOULD NOT BE DECOMPOSED. They should be included by category (CDX, iTraxx, Loan Index) in the Indices, Index Tranches and the Index Options sections.

### **Profit/(Loss) Calculation:**

Profit/(Loss) should be calculated assuming full revaluation where possible. In completing the Profit/(Loss) section, firms should run full revaluations assuming all credit spreads (across all geographies and products- Munis, Corporates, CDS, etc.) move a given amount and then allocate the resulting P/L to the various rows and sections across all credit worksheets.

For example, firms should run a single full-revaluation simulation in which all spreads widen by 100% regardless of geography/product. P/L from this single simulation would then be allocated among the various rows and worksheets corresponding to different products, countries and indices.

# DRAFT

## **Spread Shocks:**

Profit/(Loss) from spread widenings should be entered using either the relative (%) section or the absolute (bps) section, but not in both. The spread widenings listed in the green cells may be modified to fit what the firm has readily available subject to the following constraints:

## **If using relative (%) widenings:**

The 50%, 100% and 200% widenings are required. At least one widening must be 400% or greater.

At least 3 widenings greater than 200% must be provided and no two adjacent widening %'s may be more than 100% apart.

## **If using absolute (bps) widenings:**

The +50 bps, +100 bps, +500 bps and +1000 bps widenings are required. At least one widening must be +2500 bps or greater.

At least 3 additional widenings above +1000 bps must be provided. These must be spaced such that no two adjacent widenings are more than 1000 bps apart.

Note that the guidance in absolute space is necessarily a function of spread levels on the effective date and therefore subject to change. Firms are strongly encouraged to provide relative (%) spread sensitivities.

# DRAFT

## **F.20—Sovereign Credit**

### **General:**

Exposures related to central governments and quasi-sovereigns that are explicitly guaranteed by the central government should be included in this worksheet and bucketed under the central government rating. Sub-sovereign exposures, such as those from municipalities, should be reported on the Munis Worksheet.

Notional **and** MV amounts should be reported for all relevant exposures.

The MV and Notional in columns (A) and (B) are to be used for sovereign bonds and sovereign CDS issued in the same currency as the base currency of the issuing sovereign. The rates sensitivities of these instruments are captured on the *Rates DV01* worksheet.

The MV and Notional in columns (C) and (D), are to be used for sovereign bonds and sovereign CDS denominated in currencies other than the base currency of the issuing sovereign. The rates sensitivities of these instruments are captured on the *Rates DV01* worksheet.

Credit spread sensitivities for sovereign CDS (regardless of currency) and for sovereign bonds denominated in currencies other than the base currency of the issuing sovereign should be entered on this worksheet. The rates sensitivities of these instruments are captured on the *Rates DV01* worksheet.

\* MV for CDS should be reported as the notional amount plus the current MTM of the CDS, i.e. the bond-equivalent market value of the CDS. The notional amount should be positive for cases where CDS protection has been sold (long underlying bond) and negative for cases where CDS protection has been bought (short underlying bond).

Exposures to SovX indices (including options on SovX indices) should be decomposed and entered on the individual country rows.

Reference the definitions on the *Regional Groupings* worksheet for which countries should be included in rows labeled "Other".

### **Profit/(Loss) Calculation:**

Profit/(Loss) should be calculated assuming full revaluation where possible. In completing the Profit/(Loss) section, firms should run full revaluations assuming all credit spreads (across all geographies and products- Munis, Corporates, CDS, etc.) move a given amount and then allocate the resulting P/L to the various rows and sections across all credit worksheets.

For example, firms should run a single full-revaluation simulation in which all spreads widen by 100% regardless of geography/product. P/L from this single simulation would then be allocated among the various rows and worksheets corresponding to different products, countries and indices.

### **Spread Shocks:**

Profit/(Loss) from spread widenings should be entered using either the relative (%) section or the absolute (bps) section, but not in both. The spread widenings listed in the green cells may be modified to fit what the firm has readily available subject to the following constraints:

#### **If using relative (%) widenings:**

**The 50%, 100%, and 200% widenings are required. At least one widening must be 300% or greater.**

**At least 2 widenings greater than 200% must be provided and no two adjacent widening %'s may be more than 100% apart.**



# DRAFT

**If using absolute (bps) widenings:**

The +50 bps, +100 bps, +500 bps and +1000 bps widenings are required. At least one widening must be +2000 bps or greater.

At least 2 additional widenings greater than or equal to +1500 bps must be provided.

Note that the guidance in absolute space is necessarily a function of spread levels on the effective date and therefore subject to change. Firms are strongly encouraged to provide relative (%) spread sensitivities.

# DRAFT

## **F.21—Credit Correlation**

### **General:**

This worksheet is meant to capture the base correlation sensitivities of various structured credit indices by tenor and also notional amounts and MV of these positions.

The percentages in the first column are detachment points for the index tranches, where the attachment point for each tranche is the detachment point of the previous tranche. For example, for the IG index, the second tranche (the 7% row of the table) refers to the 3-7% tranche that absorbs losses beyond the first 3% and up to 7% of losses.

"Equity" tranches are defined as any tranche having a 0% attachment point.

"Super Senior" tranches are defined as any tranche having a detachment point of 60% or higher.

"Mezzanine" tranches are defined as all other tranches; that is any tranche with a non-zero attachment point and a detachment point less than 60%.

Tranches with non-standard attachment points should be mapped to the closest attachment points of the best-matching index category.

### **Market Value (MV) and Notionals:**

\* MV for CDS should be reported as the notional amount plus the current MTM of the CDS, i.e. the bond-equivalent market value of the CDS. The notional amount should be positive for cases where CDS protection has been sold (long underlying bond) and negative for cases where CDS protection has been bought (short underlying bond).

The notional / MV of bespoke CDOs and indices should be split between the various indices based upon the geographical location of names in the basket.

The notional / MV of bespoke CDOs and indices should be assigned to the closest current attachment point.

Long and Short exposures should be reported from the perspective of long or short the underlying credit. For CDS contracts, the long and short direction should not be from the perspective of bought or sold credit protection, but from the perspective of long or short the underlying credit exposure. Thus, sold protection in a CDS would be reported as a long credit position.

The exposures to be reported in each of the long and short categories should be netted against like exposures as described below:

Firms should conduct all netting at the firm-wide level, not at the business or desk level. MV- longs, and MV-shorts, should be the sum of exposures to obligors (issuers) to which the firm has net MV long, and net MV short, positions respectively. To arrive at the net Long, or net Short position, exposures to the same obligor should be netted (if JTD exposures to that obligor are offsetting) before aggregation across obligors. In determining the net exposure to an obligor, structured positions that are perfect replications of each other can be offset to arrive at the net position. For instance, long positions in a collection of tranches that when combined perfectly replicate short positions in another collection of tranches or an index can be offset against each other, if all the positions are to the exact same index and series (e.g. all are exposures to the CDX NA IG series 18). (For instance, a long position in a 10-15% tranche can be offset against short positions composed of a 10-12% tranche and a 12-15% tranche, if all the tranches are on the exact same index and series.) When a perfect replication is not possible, then offsetting is not allowed (except in the case of a residual as described in the next sentence). Where the long and short positions are otherwise equivalent except for a residual, the net amount should show the entire residual exposure.

# DRAFT

Notional-long, and Notional-short, should similarly be the sum of the notional values of obligors with net long notionals, and net short notionals, positions respectively.

For index products, for the exact same index family (e.g. NA IG), series (e.g. series 18), and tranche (e.g. 0-3%), positions should be netted across maturities.

Different tranches of the same index or series may not be netted (except where replication is possible as specified above), different series of the same index may not be netted, and different index families may not be netted.

---

# DRAFT

## F.22—IDR-Corporate Credit

### General

See the *Regional Groupings* tab for the definition of Advanced Economies.

Please consider Emerging Markets to encompass all countries not defined as Advanced Economies on the *Regional Groupings* worksheet.

1. The exposures in this tab should include only corporate credit. Other structured products reported on the Securitized Products worksheet (i.e. RMBS, CMBS or ABS) should not be reported on this tab.
2. The exposures in Tables A (Single Name Products), B (Index Products) and C (Other/Unspecified) should be exposures without any decomposition/unbundling of index or structured products.
3. The single name positions in Table A should include only actual single name products such as bonds, loans, and single name CDS.
4. Table B should include all index, index tranche and bespoke products. Emerging Market CDX and iTraxx exposures should be reported in the CDX Other and iTraxx Other categories, respectively. Sovereign CDS index exposures should not be included here, they must be decomposed by country and entered on the Sovereign Credit worksheet.
5. Exposures on Tables A through C should be reported only once (with no double counting).
6. Long and short exposures should be reported from the perspective of long or short the underlying credit – i.e. positions for which a default in the underlying credit would cause a loss are considered long and should be reported with positive sign while positions that would incur gains on default are considered short and should be reported with negative sign. To further illustrate, note that the following are considered long positions:
  - sold protection in a CDS
  - sold Put option on a bond
  - bought Call option on a bond
  - sold Payer CDS index option
  - bought Receiver CDS index option
7. The exposures to be reported in each of the long and short categories should be netted against like exposures as described below:

Firms should conduct all netting at the firm-wide level, not at the business or desk level. MV- longs, and MV-shorts, should be the sum of exposures to obligors (issuers) to which the firm has net MV long, and net MV short, positions respectively. To arrive at the net Long or net Short position, exposures to the same obligor should be netted (if JTD exposures to that obligor are offsetting) before aggregation across obligors.

Notional-long, and Notional-short, should be the corresponding sum of the notional values of obligors with net long MV, and net short MV, respectively.

For index products, for the exact same index family (e.g. NA IG), series (e.g. series 18), and tranche (e.g. 0-3%), positions should be netted across maturities.

Different tranches of the same index or series may not be netted, different series of the same index may not be netted, and different index families may not be netted.
8. Market value should be reported in bond equivalent terms. The objective of the reported market value is to reflect the maximum potential jump-to-default impact of underlying obligor defaults (before considering any recovery).

CDS MV should be reported as the notional amount plus the mark-to-market value of the CDS.

The notional amount should be positive for cases where CDS protection has been sold (long underlying bond) and negative for cases where CDS protection has been bought (short underlying bond), i.e. report as follows (with  $|\cdot|$  representing absolute value),

$$MV = MTM + S * |\text{Notional}|, \text{ where } S=1 \text{ for sold protection and } S=-1 \text{ for bought protection.}$$

# DRAFT

For example \$100M bought CDS protection with positive MTM of \$5M should contribute  $MV = -\$95M$  to MV-shorts.

Options should also be reported on the basis of bond equivalent market value, and not in terms of the MTM of the option.

Bond options in particular should be reported as specified below in (i), or if that is not feasible then as in the alternative method (ii). In both cases, the long/short reporting should be on the basis of long or short the underlying credit exposure (i.e. not bought vs. sold option).

(i) MV of exposure for an Option on a bond should be reported as follows:

Sold Put:	$MV = \text{Strike} -  \text{Option MTM} $
Bought Put:	$MV =  \text{Option MTM}  - \text{Strike}$
Sold Call:	$MV = - \text{Option MTM} $
Bought Call:	$MV =  \text{Option MTM} $

Where the strike is in terms of the bond price (not the yield). Note that for bond call options, notional should be reported as zero.

(ii) As an alternative, if the firm's data systems cannot report as above, then the firm should report using the delta adjusted notional plus the option value.

Index options should have MV of exposure reported as follows:

Sold Payer:	$MV =  \text{Notional}  -  \text{Option MTM} $
Bought Payer:	$MV =  \text{Option MTM}  -  \text{Notional} $
Sold Receiver:	$MV = - \text{Option MTM} $
Bought Receiver:	$MV =  \text{Option MTM} $

9. If unable to separate into emerging markets and advanced economies, then report under corporate credit advanced economies. If unable to report separately, clearly indicate this in supporting documentation.
10. Table D should include detail on any issuer represented in Table A to which aggregate single name product exposures exceed \$50M (in absolute value terms, based on bond equivalent market value). Indicate which of these issuers feature as constituents in index positions currently held and provide the RED Code for these issuers if available.
11. Table E should include the remaining positions in Table A (issuers smaller than \$50M) that are not included in Table D.
12. Use Table F to provide a breakout by series of the index positions represented in Table B. Payer Index Options should be bucketed by moneyness based on (1- strike spread / index spread) in percentage points. For CDX IG, CDX HY, iTraxx Main and iTraxx XO report aggregate bond equivalent market value and notional for all series to which exposure is non-zero (following the same positive/negative number convention for long/short positions utilized in Table B). For CDX Other, iTraxx Other and Loan index exposures, similarly detail exposure by series but only in respect of indices to which the gross market value of positions exceeds \$100M.
13. In Table G for each index/seniority bucket populated on the Credit Correlation tab (for example, CDX IG/Equity) report the number of bespoke tranche products represented along with the average credit spread of the constituents they reference (standardizing to the 5-year tenor) as well as the average number of constituents per product.

---

~~1. For reporting in this schedule, exposures in index and structured products may be decomposed/unbundled into their underlying single name constituents if such decomposition~~

# DRAFT

is normally done in a firms' internal position measurement or models of default risk. See item (2) below on the decomposition.

The one exception to this rule is for exposures to the SovX family of indices. SovX exposures must be decomposed by country and entered on the Sovereign Credit worksheet.

2. The decomposition of structured products into the MV of single name equivalents should be done on a JTD equivalent basis—e.g. the difference in MV of the structured security assuming that the single name does and does not default, with zero recovery. Similarly, the notional amount of decomposed exposures should be the notional amount corresponding to the MV equivalent in the previous step (assuming zero recovery).
3. The single name positions in Table A should include only actual single name products such as bonds, loans, and single name CDS. The single name exposures in Tables D and E should include the single name exposures in Table A and also equivalent single name exposures from decomposition of index or structured products. In tables A, D and E, the net exposure across products to the same obligor should be reported as specified in (6) below. The exposures in Tables A (Single Name Products), B (Index Products) and C (Other/Unspecified) should be exposures without any decomposition/unbundling of index or structured products. If the firm would like to provide an all inclusive view of exposures that includes the effect of decomposed/unbundled index and structured products, these should be reported in the memorandum Tables D-G.
4. Table B should include all index, index tranche and bespoke products before any decomposition, and Table F should include index, index tranche and bespoke exposures that were not decomposed into single name underlying exposures. Similarly, Table C should include all other products before any decomposition, and Table G should include remaining other products that were not decomposed. Emerging Market CDX and iTraxx exposures should be reported in the CDX Other and iTraxx Other categories, respectively, in Table B and Table F.
5. Exposures on Tables A through C should be reported only once (with no double counting).
6. The exposures to be reported in each of the long and short categories should be netted against like exposures as described below:

Firms should conduct all netting at the firm wide level, not at the business or desk level. MV longs, and MV shorts, should be the sum of exposures to obligors (issuers) to which the firm has net MV long, and net MV short, positions respectively. To arrive at the net Long or net Short position, exposures to the same obligor should be netted (if JTD exposures to that obligor are offsetting) before aggregation across obligors.

Notional long, and Notional short, should similarly be the sum of the notional values of obligors with net long notionals, and net short notionals, positions respectively.

For index products, for the exact same index family (e.g. NA IG), series (e.g. series 18), and tranche (e.g. 0-3%), positions should be netted across maturities.

Different tranches of the same index or series may not be netted, different series of the same index may not be netted, and different index families may not be netted.
7. MV for CDS should be reported as the notional amount plus the current mark to market value (MTM) of the derivative—i.e. report in bond equivalent terms.

~~CDS should be reported as the notional amount plus the mark to market value of the CDS. The notional amount should be positive for cases where CDS protection has been sold (long underlying bond) and negative for cases where CDS protection has been bought (short underlying bond).~~

~~Options should be reported on the basis of bond equivalent market value, and not in terms of the MTM of the option. The objective of the reported market value is the bond equivalent amount for determination of the jump to default loss in the event of an obligor default. Specifically, bond options should be reported as specified in (i), or if that is not feasible then as in the alternative method (ii). In both cases, the Long/Short reporting should be on the basis of long or short the underlying credit exposure (i.e. not bought vs. sold option).~~

# DRAFT

~~(i) An Option on a bond should be reported as follows:  
Sold Put:  $MV \text{ of exposure} = \text{Strike} - \text{Option Premium}$   
Bought Put:  $MV \text{ of exposure} = \text{Option Premium} - \text{Strike}$   
Sold Call:  $MV \text{ of exposure} = -\text{Option Premium}$   
Bought Call:  $MV \text{ of exposure} = \text{Option Premium}$   
Where the strike is in terms of the bond price (not the yield).~~

~~(ii) As an alternative, if the firm's data systems cannot report as above, then the firm should report using the delta adjusted notional plus the option value.~~

- ~~8. If unable to separate into emerging markets and sovereigns, then report under corporate credit-advanced economies. If unable to report separately, clearly indicate this in supporting documentation.~~
- ~~9. The exposures in this tab should include only corporate credit. Other structured products reported on the Securitized Products worksheet (i.e. RMBS, CMBS or ABS) should not be reported on this tab.~~
- ~~10. Long and Short exposures should be reported from the perspective of long or short the underlying credit. For CDS contracts, the long and short direction should be from the perspective of long or short the underlying credit exposure, and not bought or sold credit protection. Thus, sold protection in a CDS would be reported as a long credit position. For bond options, the long or short direction should be reported on the basis of long or short the underlying credit exposure, and not bought or sold options.~~

# DRAFT

## **F.23—IDR-Jump to Default**

### **General:**

The decomposition of index and structured products into single name equivalents should be done on a JTD equivalent basis - i.e. the difference in MV of the structured security assuming that the single name does and does not default, with zero recovery.

Please enter information for any issuer for which the jump to default (using the firm's standard recovery assumptions) exceeds \$25MM.

Exposures listed in this table should include debt and equity related instruments, for corporate exposures, including exposures to standalone nonpublic companies. Exposures to Sovereigns, Agencies, Munis, ARS, and counterparty credit exposures from derivative contracts should not be reported here.

Insert additional rows if needed. Unused rows should be left blank.

The Totals section at the bottom should be the firm-wide total JTD by rating for all issuers, not just those listed here.

Exposures should include unbundled exposures from index and structured products if such unbundling is used in the reporting firm's exposures measurement or internal models.

If unbundled exposures are included, clearly indicate this in the firm's supporting documentation.



# DRAFT

## **F.24—Private Equity**

### **General:**

This worksheet is meant to capture the carry value of Private Equity investments across regions and **aggregated** by GICS code. Report the carry value of Private Equity investments reported at fair value and NAV in section (A). Report the carry value of Private Equity investments measured using accounting methods other than fair value, i.e. cost or equity methods, in section (B).

Real estate, minority interest in hedge funds, fund seed capital, infrastructure funds and investments where the GICS code is not clearly defined should be entered in the separate sections below the Data by GICS code section.

The row labelled "Unspecified Sector/Industry" is meant to capture the carrying value of investments not easily categorized into one of the specified industries and sectors, invests in several sectors and for which there is insufficient detail to break out the carrying value of the holdings into component sectors. An example would be a fund that invests in several sectors and for which there is insufficient detail to break out the carrying value of the holdings into component sectors.

### **Unfunded Commitments**

All unfunded commitment balances are expected to be included, regardless of accounting and regulatory approaches used by the firms. This applies whether the institution holds a limited or general partner position.

### **Regional Definitions**

**Western Europe:** Austria, Belgium, France, Germany, Greece, Ireland, Italy, Luxembourg, Monaco, Netherlands, Portugal, Spain, Sweden, Switzerland, UK.

**Other Developed Markets:** All "Advanced Economies" defined on the *Regional Groupings* worksheet, excluding those in Western Europe defined above.

**Emerging Markets:** All other countries.

**Unspecified Geography:** Use in cases where current systems do not allow for the geographical source to be easily identified.

# DRAFT

## **F.25—Other Fair Value Assets**

### **General:**

This worksheet is meant to capture the fair value of investments other than private equity which are subject to fair-value accounting **aggregated** by GICS code.

These entries should be broken out into whether they are equity or debt instruments and whether they are US-based or not.

Investments where the sector/industry is not clearly defined should be entered on the Unspecified Sector/Industry line.

Tax credit investment information should be entered in the separate Tax Credits section below the Data by NAICS code section.

### **Definition of Other Fair Value Assets:**

Please see the general instructions for this schedule.

-

### **BOLI, COLI, and Stable Value Wraps:**

The maximum instantaneous (post-shock) amount receivable under wrapped BOLI/COLI policies owned (directly or indirectly through the insurance carrier) by BHCs and IHC should be entered on the row labeled "BOLI, COLI and Stable Value Wraps" in the column for US Debt.

Similarly, the maximum instantaneous (post-shock) amount payable under wraps written by BHCs and IHCs should be entered in the same cell.

These should be entered as a negative asset (i.e. a negative fair value).

Firms that have a combination of unwrapped separate account COLI/BOLI, written stable value wraps and purchased stable value wraps should net the respective entries and enter them in the same cell.

In no case should exposures related to BOLI, COLI or stable value wraps on these policies be entered anywhere else in this schedule.

# DRAFT

## Schedule G—PPNR

### A. General Technical Details

This section provides general guidance and data definitions for the PPNR Schedule. The PPNR Schedule consists of four worksheets: PPNR Submission Cover Sheet, PPNR Submission worksheet, PPNR Net Interest Income (NII) worksheet, and PPNR Metrics worksheet. The four worksheets are described in detail below.

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, IHCs and SLHCs should use internal definitions and include information about the definitions used in the Supporting Documentation submitted 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 or IHC or SLHC is unable to consistently adhere to definitions, it can request an exemption. If a BHC or IHC or SLHC has to correct an error in prior filings, the BHC or IHC or SLHC should restate and resubmit going back to first quarter of 2009.

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 or IHC or SLHC 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 or IHC or SLHC 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 the BHC or IHC or SLHC has no information to report in the descriptive fields PPNR Submission footnotes 4, 7, 9, 25 or 27, PPNR NII footnotes 2 or 3, or PPNR Metric footnotes 14, 19, 20, 21, 23, 31, 32, or 34, then populate the fields with "N/A." Do not leave descriptive fields blank.

The BHCs, IHCs, and SLHCs need to ensure that (a) revenues and expenses reported always reconcile on a net basis to the following as defined in the FR Y-9C, Schedule HI, item 3 plus Schedule HI, item 5.m less Schedule HI, item 7.e plus Schedule HI, item 7.c.(1) less PPNR Submission worksheet, item 40, Valuation Adjustment for firm's own debt under fair value option (FVO), (b) Net Interest Income is equal between the PPNR Submission and PPNR Net Interest Income worksheets, and that (c) Average balances reported for the purposes of the PPNR Net Interest Income worksheet equal FR Y-9C, Schedule HC-K, item 5 for item 17, Total Average Asset Balances and an average of FR Y-9C, Schedule HC, item 21 for item 40, Total Average Liability Balances. BHCs, IHCs and SLHCs 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, IHCs and SLHCs should complete all three worksheets, including the Net Interest Income worksheet and the Net Interest Income worksheet section of the PPNR Metrics

# DRAFT

worksheet.

Report data for all quarters for a given business segment in the PPNR Submission and PPNR Metrics worksheets 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 or IHC or SLHC exceeded 5 percent in any of the most recent four actual quarters as provided by the BHC or IHC or SLHC 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 IHC or SLHC in the FR Y-14Q, provide regional breakouts (PPNR Metrics worksheet, line items 42A-42D) for all quarters in the PPNR Metrics worksheet.

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 or IHC or SLHC in the FR Y-14Q, provide related metrics data for all quarters (PPNR Metrics worksheet, line item 10).

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.

## **Net Interest Income: Primary and Supplementary Designation**

BHCs, IHCs, and SLHCs are expected to report all line items for all worksheets subject to applicable thresholds as detailed in the instructions. In addition, for all BHCs, IHCs and SLHCs that are required to complete the *PPNR Net Interest Income* worksheet, the *PPNR Net Interest Income* worksheet should be designated as "Primary Net Interest Income." The PPNR Submission worksheet for such BHCs, IHCs and SLHCs will be "Supplementary Net Interest Income" by default. For BHCs, IHCs and SLHCs that are not required to complete the *PPNR Net Interest Income* worksheet the *PPNR Submission* worksheet should be designated as "Primary Net Interest Income." PPNR Net Interest Income Worksheet will be "Supplementary Net Interest Income" for such BHCs, IHCs and SLHCs by default, but is optional. Note that this designation would refer only to the net interest income portion of the worksheets.

## **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, IHC's and SLHC's debt under fair value option (FVO), goodwill impairment, loss resulting from trading shock exercise (if applicable), as well as

# DRAFT

adjustments related to operational risk expense required for PPNR purposes. For the related items, reference the PPNR Submission worksheet and related instructions for the line items 29, 40-42. Gains and losses on AFS and HTM securities, including other than temporary impairments (OTTI) estimates,<sup>16</sup> are not a component of PPNR. 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 schedule. Total Loans Held for Sale and Loans Accounted for under the Fair Value Option (as defined in the FR Y-14A, Schedule A.1.a, line item 57) are excluded only if they are a result of a market shock exercise. Other Losses (as defined in the FR Y-14A, Schedule A.1.a, line 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 Submission worksheet.

**Run-Off or Liquidating Businesses:** operations that do not meet an accounting definition of “discontinued operations” but which the BHC or IHC or SLHC intends to exit. In order to facilitate the calculation of the proper net interest income on the *Net Interest Income worksheet*, report total balances related to discontinued operations as a negative number in “Other” in lines 15 and 38 and the corresponding average rates earned in lines 31 and 46. BHCs, IHCs and SLHCs should provide a detailed listing of the type (by corresponding line item on the *Net Interest Income worksheet*) of such balances reported as negative items in “Other” and the corresponding rates in the submission documentation.

---

<sup>16</sup> 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 part of PPNR.

# DRAFT

## **G.1—PPNR Submission Worksheet**

The PPNR Submission worksheet 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' or SLHCs' internal view used for internal capital planning purposes, the BHCs or IHCs or SLHCs should report data in the PPNR worksheets only per the standardized FR Y-14 requirements. The BHCs 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 and IHCs are unable to comply with the requirements, they can request a temporary exemption. This guidance applies to PPNR Submission and PPNR Net Interest Income worksheets. 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 Submission worksheet and related instructions for the line items 29, 40, and 42. In the documentation supporting the FR Y-14A PPNR submission, BHCs, IHCs and SLHCs 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<sup>17</sup>, as a component of PPNR.

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 or IHC or SLHC. Supporting documentation 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 worksheet 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 and IHCs are encouraged to note which line items contain Debt Valuation Adjustments (DVA) and/or Credit Valuation Adjustments (CVA) (note: these are different from fair value adjustment on the BHC's or IHC's or SLHC'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 Submission Worksheet in accordance with the BHC's, IHC's and SLHC's normal accounting procedures.

---

<sup>17</sup> 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 part of PPNR.

# DRAFT

## 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 or IHC's or SLHC's internal reporting for these client segments deviates from this general guidance, continue to report according to internal definitions and describe how the BHC or IHC or SLHC defined these or similar client segments and the scope of related business segments/lines (internal and those defined in the FR Y-14 PPNR worksheets) in the memo supporting the FR Y-14A submission.
- A BHC or IHC 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 IHC or SLHC. For example, if the BHC or IHC or SLHC acts in a custodial or administrative capacity, the BHC or IHC or SLHC may report public funds in Investor Services. If a BHC or IHC or SLHC is involved in the management of funds, the BHC or IHC or SLHC 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 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 businesses<sup>18</sup>. Exclude any revenues related to Wealth Management/Private Banking (WM/PB) clients even if they are internally classified as retail. BHCs, IHCs and SLHCs 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 Submission worksheet.

### Line item 1A Domestic

This item is a shaded cell and is derived from the sum of items 1B through 1F.

### Line item 1B Credit and Charge Cards

Report net interest income from domestic BHC, IHC and SLHC 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.

---

<sup>18</sup> See "Commonly Used Terms and Abbreviations" for the definition.

# DRAFT

## **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).
- 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 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**



# DRAFT

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, credit).
- 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.

## **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 or IHC or SLHC accepting risks related to actuarial assumptions or the estimation of market returns where guarantees of future income streams have been made to clients.

# DRAFT

## 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<sup>19</sup>, 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 businesses<sup>20</sup> (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, IHCs, and SLHCs 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 or IHC or SLHC in the FR Y-14Q, report data for the largest business segment among the immaterial business segments for all quarters in the PPNR Submission and PPNR Metrics worksheets such that the amount reported in the Optional Immaterial Business segments line items does not exceed 10 percent. BHCs 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 13 Total Net Interest Income

This item is a shaded cell and is derived from the sum of items 1, 2 through 5, and 6 through 12. Line item 13 should equal item 49 on PPNR NII Worksheet, 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 from the sum of items 14A and 14T.

## Line item 14A Domestic

This item is a shaded cell and is derived 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 businesses<sup>21</sup>. Exclude any revenues related to Wealth Management/Private Banking (WM/PB) clients even if they are internally classified as retail. BHCs 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 Submission worksheet.

---

<sup>19</sup> 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 part of PPNR.

<sup>20</sup> See "Commonly Used Terms and Abbreviations" for the definition.

<sup>21</sup> See "Commonly Used Terms and Abbreviations" for the definition.

# DRAFT

## **Line item 14B Credit and Charge Cards**

This item is a shaded cell and is derived from the sum of items 14C and 14D.

Report in the appropriate sub-item all noninterest income generated from domestic BHC, IHC and SLHC 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, IHC and SLHC 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 line 14C.

## **Line item 14E Mortgage and Home Equity**

This item is a shaded cell and is derived 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.

## **Line item 14F Production**

This item is a shaded cell and is derived 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 line 14G.

## **Line item 14I Servicing**

This item is a shaded cell and is derived 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;

# DRAFT

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 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 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.

# DRAFT

## **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 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).

### **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 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 or IHC or SLHC 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 or IHC or SLHC 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 or SLHC's proportionate share of the income or other adjustments from its investments in equity method investees.

# DRAFT

## **Line item 18 Sales and Trading**

This item is a shaded cell and is derived 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 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 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 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 and 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 or IHC or SLHC 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 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 from the sum of items 18L and 18M. Report in the

# DRAFT

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 from the sum of items 19A and 19B. Report in the appropriate sub-item all noninterest income generated from investment management activities.

## **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 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 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

# DRAFT

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, IHC and SLHC 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 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<sup>22</sup>, 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 businesses<sup>12</sup> (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 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. 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 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 from the sum of items 13 and 26.

## **Noninterest Expense Components**

Noninterest Expense figures are to be broken out as detailed on the worksheet. 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 worksheets, the adjustments include exclusions of goodwill impairment and adjustments related to operational risk expense required for PPNR purposes. For the related items, reference PPNR Submission worksheet and related instructions for the line

---

<sup>22</sup> 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 part of PPNR.



# DRAFT

items 29 and 41.

Expense data on the PPNR Submission worksheet are only intended to be reported as firm-wide BHC or IHC or SLHC 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 or IHC or SLHC 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 or IHC or SLHC 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 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 or IHC or SLHC stock.

## **Line item 29 Operational Risk Expense**

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**

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).

# DRAFT

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 from the sum of items 34A and 34B.

## **Line item 34A Domestic Credit and Charge Card Marketing Expense**

Include domestic BHC, IHC and SLHC issued credit and charge cards, as defined in line item 1.b, 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.

See Instructions for description of standardized Business Segments/Lines. Unless specified otherwise, all numbers are global.

## **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.

## **Line item 38 Total Noninterest Expense**

This item is a shaded cell and is derived from the sum of items 28, 29 through 34, and 35 through 37. Excludes Goodwill Impairment included in item 41.

# DRAFT

**Line item 39 Actual PPNR**

This item is a shaded cell and is derived 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 through 42.

**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. List FR Y-9C, Schedule HI items from which this item is excluded in Footnote 27.

**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 from the sum of items 58 through 62 on the Worksheet 1.a, Income Statement. BHCs 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.

---

# DRAFT

## G.2—PPNR Net Interest Income (NII) Worksheet

All BHCs, IHCs and SLHCs are required to submit the Net Interest Income worksheet. BHCs, IHCs, and SLHCs should complete non-shaded cells only; all shaded cells with embedded formulas will self-populate.

This worksheet requires BHCs, IHCs and SLHCs 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 Submission worksheet.

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, IHCs and SLHCs 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 or IHC's or SLHC'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 worksheet are intended to provide a product level view exclusive of transfer pricing activity and should be reported on a gross basis. The reporting of net interest income on the *PPNR Submission worksheets* provide a business line view and should be reported net of transfer pricing adjustments.

### **Average Assets**

BHCs, IHCs and SLHCs should reference FR Y-9C and other definitions provided in the PPNR Net Interest Income worksheet when completing this section. Align the asset categories definitions, where no FR Y9C code is provided, with those on the Balance Sheet worksheet 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 worksheet. Include **purchased credit impaired loans** PCI loan balances and the interest income recognized on these loans.<sup>23</sup> 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, IHCs and SLHCs are encouraged to provide details on the nonaccrual loans by Balance Sheet worksheet definition, if available, in the documentation supporting their FR Y-14A submission.

Average balances on the PPNR Net Interest Income worksheets (both on FR Y-14Q and FR Y-14A) are intended to be reported in a manner consistent with items on the Balance Sheet worksheet of FR Y-14A schedule. As such, average asset balances on PPNR Net Interest Income worksheet are to reconcile to average of asset balances based on FR Y-9C BHCK2170 (which reflects fair value of AFS securities). If this reporting results in recording certain non-earning assets in the average trading assets line on the PPNR Net II worksheet (or any other line item with an associated rate), a BHC or IHC or SLHC should simply reduce the weighted average rate applied to that balance to ensure that

---

<sup>23</sup> 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

income forecasts are calculated appropriately.

**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 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 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 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 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, 4, 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**

# DRAFT

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 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 line items 10 and 11 (defined in the FR Y-9C, Schedule HC, items 2.a and 2.b less Net II Worksheet line 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 Worksheet is intended for a BHC or IHC or SLHC 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 from sum of items 1, 2, 3 through 6, 7, and 8 through 16.

## **Average Rates Earned**

All rates are annualized.

# DRAFT

**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.

**Line item 19 Second/Junior Lien Residential Mortgages (in domestic offices)**

This item is a shaded cell and is derived 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 worksheet).

**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, column A.

**Line item 23 Other Consumer**

This item is a shaded cell and is derived 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 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.

# DRAFT

## **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 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 from sum of the products of items 1 and 18, 2A and 19A, 2B and 19B, 3 and 20, 4 and 21, 5 and 22, 6A and 23A, 6B and 23B, 6C and 23C, 7 and 24, 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 and IHCs should report based on internal definitions (those deemed to best represent the behavior characteristics of deposits). For all other liabilities, BHC, IHC and SLHC should reference FR Y-9C and other definitions provided in the PPNR Net interest Income worksheet when completing this section.

## **Line item 34 Deposits-Domestic**

This item is a shaded cell and is derived 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**



# DRAFT

Report balances using internal definitions.

**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 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 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.

# DRAFT

## **Line item 38 Subordinated Notes Payable to Unconsolidated Trusts Issuing Trust Preferred 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 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 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 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 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 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 from item 33 minus item 48. Amount should equal Worksheet 7.a, PPNR Submission Worksheet, item 13.

---

# DRAFT

## **G.3—PPNR Metrics**

The PPNR Metrics worksheet requests information on certain metrics relevant for the assessment of various components of PPNR. All metrics are required of all BHCs, IHCs and SLHCs, subject to applicable thresholds.

Metrics in Section A, "Metrics by Business Segment/Line," correspond to Business Segments/Lines on PPNR Submission worksheet. In contrast, Sections B and C are both for firm-wide metrics.

In providing industry market size information, BHCs 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 worksheet. A BHC or IHC or SLHC, 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 and IHCs should use internal definitions of proprietary trading and clearly describe the covered activities and transactions in methodology narratives.

If a BHC or IHC or SLHC is unable to provide a metric on the PPNR Metrics worksheet, it should offer a data series for alternative metrics that are considered by the BHC or IHC or SLHC 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.

**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 Worksheet. This means that each metric is reflective of revenues reported on the PPNR Submission worksheet 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 Worksheet 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.

# DRAFT

Marketing Expense Amortization) in footnote 34.

## **Mortgages and Home Equity**

### **Line item 4 Average Third-Party Residential Mortgages Serviced**

Report the average outstanding principal balance for residential mortgage loans the BHC or IHC or SLHC 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 or IHC or SLHC 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 quarter in item 16, Investment Banking, of Schedule G.1 (PPNR Submission) should report the investment banking metrics below (Lines 11 to 26).**

### **Line item 11 Number of Employees**

# DRAFT

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.

## **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 or IHC or SLHC.

### **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 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 or IHC's or SLHC'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 or IHC or SLHC.

### **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 or IHC or SLHC.

### **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**

# DRAFT

## **Line item 24 Deal Volume**

Report the global dollar volume of all deals for the reporting BHC or IHC or SLHC.

## **Line item 25 Industry Market Size - Fees**

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.

# DRAFT

## **Line item 34 Transaction Volume**

Report total dollar volume of all transactions during the quarter.

## **Investment Management Segment**

### **Asset Management**

#### **Line item 35 AUM – Total**

This item is a shaded cell and is derived 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 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.



# DRAFT

## 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.

### **B. Firm Wide Metrics: PPNR Projections Worksheet**

#### **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 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 from PPNR Submission Worksheet 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 worksheet 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 from the sum of items 45A and 45B.

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

# DRAFT

collateral subject to capital/ financing type leases.

## **Line item 45A Auto**

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 45B 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 46 OREO Balance**

This item is a shaded cell and is derived from the sum of items 46A through 46C. 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 worksheet which sources the data directly from FR Y-14A Balance Sheet worksheet. Thus, reporting of OREO items on FR Y-14Q PPNR Metrics worksheet is consistent with reporting of OREO items on FR Y-14A Balance Sheet worksheet.

## **Line item 46A 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 46B 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 46C 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 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 Worksheet that include this item, if any.

# DRAFT

C. **Firm Wide Metrics: Net Interest Income Worksheet** (Required only for BHCs,IHCs or SLHCs that were required to complete the Net Interest Income Worksheet)

**Line item 50 Carrying Value of Purchased Credit Impaired (PCI) Loans<sup>24</sup>**

Report trading revenue 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 Revenues<sup>25</sup>**

Report the net accretion of discount on PCI loans included in net interest income as included on the PPNR Submission Worksheet and Net Interest Income Worksheet.

**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 Worksheet.

**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 Worksheet.

**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 worksheet 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).

---

<sup>24</sup> Institutions that have adopted ASU 2016-13 should report the carrying value of purchased credit-deteriorated loans.

<sup>25</sup> Institutions that have adopted ASU 2016-13 should report the net accretion of discount on loans included in net interest income as included on the PPNR Submission Worksheet and Net Interest Income Worksheet.

# DRAFT

**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**

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 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 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,

# DRAFT

Schedule HC, as items 2.a and 2.b less PPNR Metrics Worksheet 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 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 worksheet 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,

# DRAFT

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 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 77 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 the balance-weighted average of the betas of the line items that contribute to the roll up point requested, with an as-of-date equal to the reporting date. The beta should be the beta utilized for forecasting purposes 'normal environment'.

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.

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. 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 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

# DRAFT

assumed by each of the major deposit products is not restricted by a cap, floor, or zero. Beta should be reported as the balance-weighted average of the betas of the line items that contribute to the roll up point requested, with an as-of-date equal to the reporting date.

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.

The beta ratios for line items 83 through 84 should be reported in basis points (bp) movement in the yield curve, either up or down in relationship to an assumed 100 bps movement

## **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 worksheet 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 H—Wholesale Risk

### **H.1 - Corporate Loan Data Schedule**

The Corporate Loan Data Schedule collects loan level detail on corporate loans and leases. The data collection has two sections: (1) Loan and Obligor Description section (Fields 1 through 51, and Fields 83 through 108), which collects information related to the obligor and the loan itself; and (2) Obligor Financial Data section (Fields 52 through 82), which collects data related to the financial health of the obligor or the entity that is the primary source of repayment for the loan. Both sections are completed at a loan level detail.

#### **A. Loan Population**

The loan population includes corporate loans and leases that are held for investment (HFI) (as defined in the FR Y-9C, Schedule HC-C General Instructions) and held for sale (HFS) as of the report date. Include HFI and HFS loans that the holding company has elected to report at fair value under the fair value option. Exclude all loans and leases classified as trading (reportable on the FR Y-9C, Schedule HC, item 5).

Include all corporate loans that are at the consolidated BHC, IHC and SLHC level and not just those of the banking subsidiaries, as well as any unused commitments that are reported on Schedule HC-L that would be reported in the relevant FR Y-9C category (as outlined below) if such loans were drawn (including all undrawn commitments extended to non-consolidated variable interest entities and commitments to commit as defined in the FR Y-9C). Exclude informal “advised lines” (i.e., a revocable commitment by the bank to lend funds for up to a specified period of time, usually one year, sometimes referred to as a guidance line) from commitments.

Report potential exposures from the syndicated loan pipeline including exposures where the BHC or IHC or SLHC has signed a commitment letter and has extended terms to the borrower, even if the borrower has not countersigned the commitment letter (i.e. single signed commitment). Commitments are to be reported regardless of whether they contain “material adverse change” clauses or other provisions that are intended to relieve the BHC or IHC or SLHC of its funding obligations under certain conditions.

In addition to corporate loans and leases that are currently active as of the reporting date, the loan population should also include corporate loans and leases that were disposed of during the reporting period. For purposes of this schedule, refer to Field 98 (Disposition Flag) for specific instructions on instances of disposed corporate loans and leases.

The loan population is limited to corporate loans and leases with a committed balance greater than or equal to \$1 million. Although corporate loans and leases with a committed balance under \$1 million are not reported on the FR Y-14Q Corporate Loans Schedule, the sum of the outstanding balance of these loans would be included in the relevant fields on the FR Y-14Q Supplemental Schedule and the FR Y-14A Summary Schedule pursuant to the instructions for those schedules.

In general, use loan classifications on the FR Y-9C, Schedule HC-C as a guide in determining the population of corporate loans and leases. Refer to the FR Y-9C, Schedule HC-C instructions for specific guidance on loan classifications. In determining loan classifications on the FR Y-14Q Corporate Loan Data Schedule, look to the security, borrower, or purpose of the loan. Below is a list of FR Y-9C, Schedule HC-C categories that are considered corporate loans:

- 1) Loans to U.S. banks and other U.S. depository institutions (FR Y-9C, Schedule HC-C, item 2.a);



# DRAFT

- 2) Loans to foreign banks (FR Y-9C, Schedule HC-C, item 2.b);
- 3) Loans to finance agricultural production and other loans to farmers (FR Y-9C, Schedule HC-C, item 3);
- 4) Commercial and industrial loans to U.S. addresses (FR Y-9C, Schedule HC-C, item 4.a);
- 5) Commercial and industrial loans to non-U.S. addresses (FR Y-9C, Schedule HC-C, item 4.b);
- 6) Loans to foreign governments and official institutions (including foreign central banks) (FR Y-9C, Schedule HC-C, item 7);
- 7) Loans to non-depository financial institutions (FR Y-9C, Schedule HC-C, item 9.a);
- 8) All other loans, excluding consumer loans (FR Y-9C, Schedule HC-C, item 9.b(2));
- 9) All other leases, excluding consumer leases (FR Y-9C, Schedule HC-C, item 10.b);
- 10) Loans secured by owner-occupied nonfarm nonresidential properties originated in domestic offices (FR Y-9C, Schedule HC-C, item 1.e(1)); and
- 11) Loans secured by owner-occupied nonfarm nonresidential properties originated in non-domestic offices (reported within FR Y-9C, Schedule HC-C, item 1).

Report loans secured by owner-occupied nonfarm nonresidential properties on the FR Y-14Q Corporate Loans Schedule, even if they are cross-collateralized with a loan reported on the FR Y-14Q Commercial Real Estate Schedule. Loans secured by owner-occupied nonfarm nonresidential properties are those nonfarm nonresidential property loans for which the primary source of repayment is the cash from the ongoing operations and activities conducted by the party, or an affiliate of the party, who owns the property. Thus, for loans secured by owner-occupied nonfarm nonresidential properties, the primary source of repayment is not derived from third party, nonaffiliated, rental income associated with the property (i.e., any such rental income is less than fifty percent (50%) of the source of repayment) or the proceeds of the sale, refinancing, or permanent financing of the property. Consequently, such loans are considered corporate loans rather than commercial real estate loans.

Exclude small business loans from the loan population as they are reportable on the FR Y-14Q US Small Business Schedule and the International Small Business Schedule. The main differentiating factor between corporate loans and small business loans is how the consolidated holding company evaluates the creditworthiness of the borrower. For corporate lending, banks look at the commercial operations process (commercial grading or internal risk rating) to assess credit risk. Therefore, corporate loans are loans that are “graded” or “rated” using the consolidated holding company’s commercial credit rating system, as it is defined in the consolidated holding company’s normal course of business. Meanwhile, for small business lending, banks look at the credit score of the borrower (scored rating) and/or use delinquency management. Therefore, small business loans are loans that are “scored” or “delinquency managed” for which a commercial internal risk rating is not used or that uses a different scale than other corporate loans.

Report non-purpose loans reportable in the relevant FR Y-9C, Schedule HC-C categories outlined above and in Field 26 ‘Line Reported on FR Y-9C’ regardless of whether those loans are “graded.” For purposes of this schedule, non-purpose loans are loans collateralized by securities made for any purpose other than purchasing or carrying securities.

Exclude unplanned overdrafts (as defined in the FR Y-9C, Schedule HC-C, item 9).

Exclude domestic and international business and corporate credit card or charge card loans included in the FR Y-14Q/M, Credit Card Data Collections (see the FR Y-14M, Credit Card Data Collection Data Dictionary for the definition of business and corporate credit card or charge card loans). For example, if 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, the loan should be reported on the FR Y-14Q/M Credit Card Data Collections. Alternatively,

# DRAFT

loans with a committed balance greater than \$1 million for which a commercially-graded corporation is ultimately responsible for repayment of credit losses incurred should be reported in the FR Y-14Q Corporate Loan schedule.

The population of loans should be reported at the credit facility level. For purposes of this collection, a credit facility is defined as a credit extension to a legal entity under a specific credit agreement. A credit facility may be secured or unsecured, term or revolving, drawn or undrawn (excluding informal advised lines). The credit facility may also allow for multiple extensions of credit (or draws) with unique borrowing terms such as interest rate or repayment date; however, ultimately the aggregation of such extensions of credit are governed under one common credit agreement. Descriptions of typical credit facility types are outlined in Field 20. The \$1 million dollar reporting threshold applies to any set of commitments where the sum of those commitments, governed under one common credit agreement, is greater than or equal to \$1 million. These criteria are the same for all extensions of credit and all types of standby letters of credit. Corporate borrowers may also have multiple facilities from the same bank. Each facility should be reported separately, but multiple draws within a facility should be consolidated at the facility level. If a borrower has more than one legally separate credit facility each with a committed amount of less than \$1 million, those facilities would be excluded from the Corporate Loans Data collection even if they are cross defaulted and/or cross collateralized.

Credit facilities containing loans which fall under one or more of the FR Y-9C line items outlined above should be reported on the FR Y-14Q Corporate Loan Data schedule at the credit facility level. For credit facilities also containing loans reported on FR Y-9C line items not outlined above, the underlying loans should be aggregated and reported on the respective FR Y-14Q schedules based on the relevant schedule instructions. For example, consider a credit facility which has the following underlying loan commitments:

Loan 1: \$2 million committed balance reported on FR Y-9C, Schedule HC-C, item 4.a

Loan 2: \$1 million committed balance reported on FR Y-9C, Schedule HC-C, item 4.b

Loan 3: \$500,000 committed balance reported on FR Y-9C, Schedule HC-C, item 1.e(1)

Loan 4: \$ 500,000 committed balance reported on FR Y-9C, Schedule HC-C, item 1.d

The BHC or IHC or SLHC should aggregate loans 1, 2, and 3 and report one facility with a \$3.5 million committed balance on the FR Y-14Q Corporate Loan schedule and one facility with a \$500,000 committed balance on the FR Y-14Q Commercial Real Estate schedule. **Note that all loans within the facility are reported, including those under the credit facility threshold.** In the above example, the \$500,000 committed balance is reported on the FR Y-14Q CRE schedule because of the overall facility commitment is greater than \$1 million.

## **B. Reporting Specifications**

Report all loan and lease financing receivables consistent with the FR Y-9C instructions. Report the amortized cost for HFI loans and the lower of cost or fair value for HFS loans. Report at fair value all HFS and HFI loans that the firm has elected to report under a fair value option.

Once a credit facility is closed and settled (Option '4' in Field 100), all dollar amounts in the Loan and Obligor Description section should represent only the consolidated holding company's pro-

# DRAFT

rata portion of any syndicated or participated loan.

The loan population also includes credit facilities which include a fronting exposure. Fronting exposures are those that represent a BHC's or IHC's or SLHC's exposure to fund certain obligations (e.g., swingline or letters of credit) on behalf of other participant lenders. For such exposures, BHCs, IHCs and SLHCs should indicate Option 18 in Field 20 'Credit Facility Type' and report their pro-rata portion of the stated commitment amount as one facility to the borrower and the fronting obligations as separate credit facilities to each of the lending group participants. For example, consider a facility with \$400 million committed balance where the BHC or IHC or SLHC is the agent bank and the BHC's or IHC's or SLHC's pro-rata share of the commitment is 10% or \$40 million. Assume further that the credit facility contains a \$50 million sublimit that the BHC or IHC or SLHC, as agent, has an obligation to advance on behalf of lending group participants which may include swinglines, letters of credit and other fronting obligations. In this example, the agent BHC or IHC or SLHC would report a \$40 million pro-rata commitment as one credit facility to the borrower and would report 90% of the \$50 million sublimit (or \$45 million) as separate pro-rata credit facilities to the lending group participants.

All amounts should be reported in US dollars.

## C. Obligor Financial Data Section Instructions

Fields 52 through 82 (Obligor Financial Data section), must be reported for all corporate loans and leases as of the report date, excluding loans with:

- (i) An obligor domiciled (as defined in the FR Y-9C Glossary entry for "domicile") outside of the US (Field 6);
- (ii) An obligor with a NAICS code beginning with 52 (Finance and Insurance), or 5312 (Real Estate Agents and Brokers), or 551111 (Offices of Bank or Intermediate Holding Companies);
- (iii) An obligor that is a nonprofit organization or federal, state, or local government or related agencies; or
- (iv) An obligor that is a Natural Person (including individuals doing business as (DBA) another entity where the primary source of repayment analyzed is the personal credit of the natural person behind the DBA).

For loans that meet the exclusions above, Fields 52 through 82 should be left blank. The exclusions outlined above for the Obligor Financial Data section are at the obligor or primary source of repayment entity level.

The Obligor Financial Data Section relates to the legal entity that provides the primary source of repayment for the credit facility identified in Field 15. If the legal entity used by underwriting as the primary source of repayment is different from the legal entity actually making the payment, report the Obligor Financial Data Section for the entity used by underwriting. Note, the legal entity that provides the primary source of repayment will generally be different from the guarantor, which provides secondary support for repayment. Information related to the guarantor should be reported in Fields 44 through 48 of the Loan and Obligor Description section.

If this legal entity that provides the primary source of repayment is the same as the Obligor identified in Field 2, the Obligor Financial Data Section should reflect financial information of that Obligor and Fields 49 through 51, ~~and~~ Field 95, ~~and~~ Field 110 should be left blank. However, if the primary source of repayment is provided by an entity that is different than the Obligor identified in Field 2, the entity should be identified in Fields 49-51, ~~and~~ Field 95, ~~and~~ Field 110 and the Obligor Financial Data section should reflect the financial information for this entity. All other Obligor Fields reported in the Loan and Obligor Description section should continue to

# DRAFT

reflect the Obligor identified in Field 2.

For a credit facility for which there is no clear predominant borrower that serves as the primary source of repayment, the Obligor Financial Data Section should reflect the financial information of the entity that best represents the credit repayment capacity for the credit facility. For loans secured by owner occupied real estate for which the primary source of repayment is an operating company that occupies the real estate and is an affiliate of the property company which owns the property, the Obligor Financial Data Section should reflect the financial information of the operating company.

Data in Fields 54 through 82 should be reported or calculated in accordance with GAAP standards. Note descriptions in the Obligor Financial Data Section provide guidance on what should be reported in each field based on commonly-used definitions; unless otherwise instructed, a reporting bank should report the Fields as defined by its financial spreading systems (i.e., software programs on which the BHC or IHC or SLHC spreads and analyzes the financial statements of its customers) in accordance with its credit policy. The financial statement data fields should be populated with the most recent financial statement data available as of the report date (i.e. the most recent financial data found in the consolidated holding company's financial spreading system as of the report date) and should not be bound by financial statement data that was used in the consolidated holding company's most recent formal rating review.

Fields 54, 56, 57, 58, 59, and 82 should be reported for the most recently available trailing twelve month (TTM) period, with the ending date indicated in Field 52. If an obligor lacks trailing twelve months of financial information sufficient for Fields 54, 56, 57, 58, 59, and 82, provide the underwritten annual information for Fields 54, 56, 57, 58, 59 and 82, with the ending date indicated in Field 52. Fields 55 and 60 should be reported for the TTM period ended one year prior to the date indicated in Field 52. If an obligor lacks trailing twelve months of financial information sufficient for Fields 55 and 60, provide the underwritten annual information for Fields 55 and 60, with the ending date one year prior to the date indicated in Field 52.

## **Data Format**

Data should be provided in a single extensible markup language file (.xml). No quotation marks should be used as text identifiers. Do not provide a header row or a row count. This file will contain one record per active loan in the contributor's inventory.

For fields that the schedule specifies as a date, but the XSD specifies as a datetime, provide T00:00:00 as the time.

## **D. Corporate Loan Data Fields**

The table on the following pages shows the fields that should be contained in the submission file. Report all fields with data as of the report date. For corporate loans and leases disposed of during the reporting period, report all fields as of the date of disposition, unless otherwise instructed in individual field descriptions.

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
1	Customer ID ( <i>CustomerID</i> )	CLCOM047	Report the unique internal identifier for the customer relationship under which the obligor's exposure is aggregated in the reporting entity's credit systems. Customer ID is a relationship concept under which multiple borrowers are aggregated because they have related risks, including, but not limited to parent/subsidiary relationships. For stand-alone or ultimate parent obligors, the Customer ID may be the same as the unique internal identifier for the obligor provided in Field 2.	Must not contain a carriage return, line feed, comma or any unprintable character.
2	Internal ID ( <i>InternalObligor ID</i> )	CLCOM300	Report the reporting entity's unique internal identifier for the obligor. Internal ID is a borrower concept that identifies the entity under which multiple loans are aggregated.	Must not contain a carriage return, line feed, comma or any unprintable character.
3	Original Internal ID ( <i>OriginalInternalObligorID</i> )	CLCOG064	Report the internal identification code assigned to the obligor in the previous submission. If there is no change from the prior submission, or if this is the first submission, the Internal ID reported in Field 2 should be used as the Original Internal ID.	Must not contain a carriage return, line feed, comma or any unprintable character.
4	Obligor Name ( <i>ObligorName</i> )	CLCO9017	Report the obligor name on the credit facility.  Full legal corporate name is desirable. If the borrowing entity is an individual(s) (Natural Person(s)), do not report the name; instead substitute with the text: "Individual."  For fronting exposures, report legal name of the participant lender.	Must not contain a carriage return, line feed, comma or any unprintable character.
5	City ( <i>City</i> )	CLCO9130	Report the name of the city in which the obligor is domiciled (as defined in the FR Y-9C Glossary entry for "domicile").	Free text indicating the City where the Obligor is domiciled.

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
6	Country ( <i>Country</i> )	CLC09031	Report the domicile of the obligor (as defined in the FR Y-9C Glossary entry for “domicile”).	Use the 2 letter Country Code <sup>26</sup>
7	Zip Code ( <i>ZipCodeForeign MailingCode</i> )	CLC09220	Report the five-digit zip code for locations within the 50 US states, Washington DC, Puerto Rico, the US Virgin Islands, Guam, Palau, Micronesia, the Northern Marianas, or the Marshall Islands. For all other locations report the foreign mailing code for the domicile of the obligor (as defined in the FR Y-9C Glossary entry for “domicile”).	For locations within the 50 US states, Washington DC, Puerto Rico, the US Virgin Islands, Guam, Palau, Micronesia, the Northern Marianas, or the Marshall Islands: five-digit ZIP code. If the ZIP code begins with zeroes, leading zeroes must be specified with no punctuation. For International: use country specific postal code.

<sup>26</sup> See link below for list of ISO standard country codes.

<https://www.iso.org/iso-3166-country-codes.html>.

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
8	Industry Code ( <i>IndustryCode</i> )	CLCO4537	<p>Report the numeric code that describes the primary business activity of the obligor according to the North American Industry Classification System (NAICS). If the NAICS code is not available, provide either the Standard Industrial Classification (SIC), or Global Industry Classification Standard (GICS).</p> <p>If the obligor is an individual, the industry code should be consistent with the industry in which the commercial purpose of the loan operates.</p> <p>If the business or individual operates in multiple industries, the BHC or IHC or SLHC should report the industry that best represents the commercial risk of the loan (i.e., the predominant industry).</p>	Report 4 to 6 digit number. If this code is not available, then provide a SIC or GICS industry code.
9	Industry Code Type ( <i>IndustryCodeType</i> )	CLCOM297	Select the type of industry code identification scheme used in Field 8.	1. NAICS 2. SIC 3. GICS
10	Obligor Internal Risk Rating ( <i>InternalRating</i> )	CLCOG080	<p>Report the obligor rating grade from the reporting entity's internal risk rating system. For fronting exposures, report the participant lender's rating grade from the reporting entity's internal risk rating system.</p> <p>This is the reporting entity's probability of default (PD) rating. If the reporting entity uses a one-dimensional risk rating system, record that rating here.</p>	<p>Free text indicating the obligor rating grade.</p> <p>Obligor Internal Risk Rating must be consistent with Schedule H.4 (Internal Risk Rating Schedule), Field 1.</p>

# DRAFT

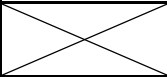
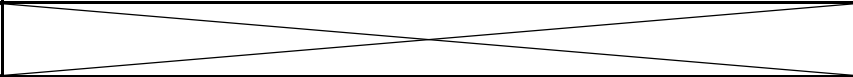
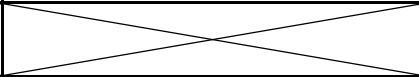
Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
11	TIN ( <i>TIN</i> )	CLC06191	Report the Taxpayer Identification Number (TIN) assigned to the obligor by the U.S. Internal Revenue Service (IRS) in the administration of tax laws. If the borrowing entity is an individual(s) (Natural Person(s)), do not report Social Security Number; instead enter 'NA'. If, the borrowing entity does not have a TIN, enter 'NA'.	The 9 digit assigned by the Internal Revenue Service for the obligor identified in field 2.  Allowable forms are either ##-#####,##### #, or 'NA'.
12	Stock Exchange ( <i>StockExchange</i> )	CLC04534	Report the name of the Stock Exchange on which the primary stock of the obligor, or its parent, trades. If the borrowing entity is not publicly traded, enter 'NA'. In cases where the subsidiary is the obligor and the subsidiary is publicly traded, report the Stock Exchange and Ticker Symbol (field #13) of the subsidiary, regardless of ownership structure. If the subsidiary is not publicly traded, but its parent is, report the stock exchange and ticker symbol of the parent. Report in the same manner when the subsidiary is minority owned.	Free text
13	Ticker Symbol ( <i>TKR</i> )	CLC04539	Report the Stock Symbol for stocks listed and traded on the regulated exchange provided in Field 12. For subsidiaries of public companies, use parent ticker symbol from its primary Stock Exchange. If the borrowing entity is not publicly traded, enter 'NA'. In cases where the subsidiary is the obligor and the subsidiary is publicly traded, report the Stock Exchange (field #12) and Ticker Symbol of the subsidiary, regardless of ownership structure. If the subsidiary is not publicly traded, but its parent is, report the stock exchange and ticker symbol of the parent. Report in the same manner when the subsidiary is minority owned.	Free text



# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
14	CUSIP ( <i>CUSIP</i> )	CLCO9161	<p>Report the CUSIP of the obligor, if available. CUSIPs are identifiers created and delivered by the CSB (CUSIP Service Bureau). The CSB is managed on behalf of the American Bankers Association by Standard &amp; Poor's. Issuer codes are assigned alphabetically from a series that includes deliberate built-in "gaps" for future expansion.</p> <p>Report the first six characters which are known as the base (or CUSIP-6) and uniquely identify the issuer. If a CUSIP does not apply, enter 'NA'.</p>	Must be valid 6 digit CUSIP number issued by the CUSIP Service Bureau.
15	Internal Credit Facility ID ( <i>InternalCreditFacilityID</i> )	CLCOM142	<p>Report the reporting entity's unique internal identifier for this credit facility record. It must identify the credit facility for its entire life and must be unique.</p> <p>In the event the internal facility ID changes (i.e., loan was converted to a new system through migration or acquisition), also provide Original Internal credit facility ID in Field 16.</p> <p>For fronting exposures, report the unique internal identifier assigned to the participant lender's fronting allocation.</p>	<p>Must be unique within a submission and over time. That is, the same submission file must not have two facilities with the same Credit Facility ID.</p> <p>May not contain a carriage return, line feed, comma or any unprintable character.</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
16	Original Internal Credit Facility ID  ( <i>OriginalInternal CreditFacilityID</i> )	CLCOM296	<p>Report the Internal identification code assigned to the credit facility record in the previous submission. If the credit facility represents the fulfillment of a commitment to commit or a syndicated pipeline loan reported in the previous submission, report the credit facility ID used for that formerly reported exposure. If there is no change from the prior submission, or if this is the first submission, then the Internal credit facility ID reported in Field 15 should be used as the Original Internal credit facility ID.</p> <p>For disposed credit facilities, where the reason for the disposal is rebookings/restructures where loan amounts are transferred or combined between obligations, report the ID separated by a , (comma).</p>	<p>May not contain a carriage return, line feed, or any unprintable character.</p> <p>Provide the ID separated by a , (comma). For example, if facilities 123 and XYZ are aggregated into facility ABC then the "Unique ID" (H.1 Internal Credit Facility ID Field 15, H.2 Loan Number Field 1) is reported as ABC and the "Original ID" (H.1 Original Internal Credit Facility ID Field 16, H.2 Original/Previous Loan Number Field 35) is reported as 123, XYZ.</p>
17	DO NOT USE			

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
18	Origination Date ( <i>OriginationDate</i> )	CLC09912	<p>Report the origination date. The origination date is the contractual date of the credit agreement. (In most cases, this is the date the commitment to lend becomes a legally binding commitment). If there has been a major modification to the loan such that the obligor executes a new or amended and restated credit agreement, use the revised contractual date of the credit agreement as the origination date. The following independent examples would generally not result in a change in the contractual date of the loan, and thus would not be considered major modifications: (1) extension options at the sole discretion of the borrower; (2) covenants; (3) waivers; (4) change in the maturity date; (5) repricing; or (6) periodic credit reviews. Additionally, exclude all renewals which meet the definition in the 'Renewal Date' Field 91.</p> <p>For corporate loans and leases in the syndicated pipeline, report the date on which the BHC or IHC or SLHC has extended terms to the borrower in the signed commitment letter (option 1 in field 100). Once the deal is reported as closed and settled (option 4 in Field 100), report the updated origination date per the definition above.</p> <p>For commitments to commit which are not syndicated, report the date on which the BHC or IHC or SLHC extended terms to the borrower.</p>	<p>Must be in yyyy- mm-dd format, e.g.: 2005-02-01 1999-12-14</p> <p>Must be before or equal to the period end date of the data.</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
19	Maturity Date ( <i>MaturityDate</i> )	CLC09914	<p>Report the maturity date. The maturity date is the last date upon which the funds must be repaid, inclusive of extension options that are solely at the borrower's discretion, and according to the most recent terms of the credit agreement. If extension options are conditional on certain terms being met, such extensions should be considered to be at the sole discretion of the borrower. For demand loan, enter '9999-01-01'.For corporate loans in the syndicated pipeline, until the syndicated loan is reported as closed and settled (option4 in Field 100), report the estimated maturity date based on the tenor stated in the commitment letter.</p> <p>For commitments to commit which are not syndicated, report the estimated maturity date based on the tenor in the terms extended to the borrower.</p>	<p>Must be in yyyy- mm-dd format, e.g.:</p> <p>2005-02-01 1999-12-14</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
20	Credit Facility Type <i>(FacilityType)</i>	CLCOG072	<p>Report the credit facility type. Use the following credit facility type descriptions, only. Note that these descriptions and codes mirror the requirements for Shared National Credit reporting and therefore not all will be relevant for Corporate Loan reporting. If the Credit facility type is "Other," provide description in Field 21.</p> <ul style="list-style-type: none"> <li>0 OTHER</li> <li>1 REVOLVING CREDIT</li> <li>2 REVOLVING CREDIT CONVERTING TO TERM LOAN</li> <li>3 REVOLVING CREDIT - ASSET BASED</li> <li>4 REVOLVING CREDIT - DIP (Debtor-In-Possession)</li> <li>5 NON-REVOLVING LINE OF CREDIT</li> <li>6 NON-REVOLVING LINE OF CREDIT CONVERTING TO TERM LOAN</li> <li>7 TERM LOAN</li> <li>8 TERM LOAN - A</li> <li>9 TERM LOAN - B</li> <li>10 TERM LOAN - C</li> <li>11 TERM LOAN - BRIDGE</li> <li>12 TERM LOAN - ASSET BASED</li> <li>13 TERM LOAN - DIP (Debtor-In-Possession)</li> <li>14 CAPITALIZED LEASE OBLIGATION</li> <li>15 STANDBY LETTER OF CREDIT</li> <li>16 OTHER REAL ESTATE OWNED</li> <li>17 OTHER ASSET</li> <li>18 FRONTING EXPOSURE</li> <li>19 COMMITMENT TO COMMIT</li> </ul>	Enter number code of the description.
21	Other Credit Facility Type Description <i>(OtherFacilityType)</i>	CLCOG107	If the credit facility is listed as "Other" in Field 20, provide a description of the "other credit facility type." Leave this field blank if Field 20 is not zero.	Free Text

# DRAFT

22	Credit Facility Purpose <i>(CreditFacilityPurpose)</i>	CLCOG073	<p>Report the credit facility purpose. Use the following credit purpose descriptions, only. Note that these descriptions and codes mirror the requirements for Shared National Credit reporting and therefore not all will be relevant for Corporate Loan reporting. . If the credit facility purpose is "Other," provide description in Field 23.</p> <p>For fronting exposures, report the credit facility purpose based on the primary credit facility.</p> <ul style="list-style-type: none"> <li>0 OTHER</li> <li>1 ACQUISITION AND/OR MERGER FINANCING</li> <li>2 ASSET SECURITIZATION FINANCING</li> <li>3 CAPITAL EXPENDITURES EXCLUDING REAL ESTATE</li> <li>4 COMMERCIAL PAPER BACK-UP</li> <li>5 INDUSTRIAL REVENUE BOND BACK-UP</li> <li>6 MORTGAGE WAREHOUSING</li> <li>7 TRADE FINANCING</li> <li>8 PERFORMANCE GUARANTEE</li> <li>9 WORKING CAPITAL - SHORT TERM/SEASONAL</li> <li>10 WORKING CAPITAL - PERMANENT</li> <li>11 GENERAL CORPORATE PURPOSES</li> <li>12 DEBT REFINANCE/CONSOLIDATION</li> <li>13 ESOP FINANCING</li> <li>14 AGRICULTURE AND/OR LIVESTOCK PRODUCTION</li> <li>15 AGRICULTURE AND/OR RANCHING REAL ESTATE</li> <li>16 STOCK BUYBACK</li> <li>17 PORTFOLIO ACQUISITION INCLUDING NOTE PURCHASE AGREEMENTS</li> <li>18 REAL ESTATE ACQUISITION/DEVELOPMENT/CONSTRUCTION - LAND</li> <li>19 REAL ESTATE ACQUISITION/DEVELOPMENT/CONSTRUCTION - RESIDENTIAL</li> </ul>	Enter number code of the description
			<ul style="list-style-type: none"> <li>20 REAL ESTATE ACQUISITION/DEVELOPMENT/CONSTRUCTION - COMML &amp; INDL</li> <li>21 REAL ESTATE INVESTMENT/PERMANENT FINANCING - RESIDENTIAL</li> </ul>	

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
			22 REAL ESTATE INVESTMENT/PERMANENT FINANCING - COMMERCIAL AND INDUSTRIAL 23 BUSINESS RECAPITALIZATION/DIVIDENDS 24 NEW PRODUCT DEVELOPMENT 25 PROJECT FINANCING 26 DEALER FLOORPLAN 27 EQUIPMENT LEASING 28 NON-PURPOSE LOAN COLLATERALIZED BY SECURITIES 29 BRIDGE FINANCING 30 CAPITAL CALL SUBSCRIPTION	
23	Other Credit Facility Purpose Description ( <i>OtherFacilityPurpose</i> )	CLCOG108	If the credit facility purpose is listed as “Other” in Field 22, provide a description of the “other credit facility type.” Leave this field blank if Field 22 is not zero.	Free Text

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
24	Committed Exposure Global <sup>27</sup>  ( <i>CommittedExposure</i> )	CLCOG074	<p>Report the total commitment amount as the sum of loan and lease financing receivables recorded in FR Y-9C, Schedule HC-C (reported in Field 25) and any unused portion of the commitment recorded in Schedules HC-F, HC-G, and HC-L.</p> <p>Report the total commitment amount and not the constrained commitment amount. For example, if the borrower has a contract for \$1.1 million total commitment, but is constrained by borrowing base to \$900 thousand, report the total commitment amount of \$1.1 million.</p> <p>For facilities with multiple lenders, only provide the reporting entity's pro-rata commitment, net of the above noted adjustments.</p> <p>For corporate loans and leases in the syndicated pipeline, reported as options 1 (single-signed), 2 (dual-signed) or 3 (closed but not settled) in Field 100, report the total commitment amount approved and stated in the commitment letter.</p> <p>For commitments to commit which are not syndicated, report the total commitment amount approved and offered to the borrower.</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).</p>

<sup>27</sup> Institutions that have adopted ASU 2016-13 should also refer to the specifications in the FR Y-9C for reporting this item.



# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
25	Utilized Exposure Global <sup>28</sup>  ( <i>Utilized Exposure</i> )	CLCOG075	<p>Report all loan and lease financing receivables consistent with the FR Y-9C instructions. Report the amortized cost for HFI loans and the lower of cost or fair value for HFS loans. Report at fair value all HFS and HFI loans that the firm has elected to report under a fair value option.</p> <p>For facilities with multiple lenders, only provide the reporting entity's pro-rata utilized exposure, net of the above noted adjustments.</p> <p>For fully undrawn commitments, enter 0 (zero).</p> <p>For fronting exposures, report any funds advanced to the borrower on behalf of the participant lender as identified in field 4 (Obligor Name).</p> <p>For disposed credit facilities, report 0 (zero).</p>	<p>Rounded whole dollar amount with no cents, e.g.: 20000000</p> <p>Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).</p>

<sup>28</sup> Institutions that have adopted ASU 2016-13 should also refer to the specifications in the FR Y-9C for reporting this item.

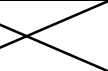
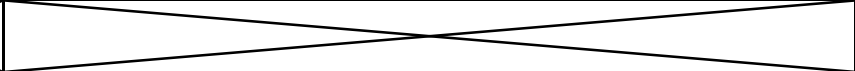

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
26	Line Reported on FR Y-9C  ( <i>LineReportedOnFRY9C</i> )	CLCOK449	<p>Report the integer code corresponding to the line number on the FR Y-9C, Schedule HC-C, in which the outstanding balance is recorded or, in the case of an unused commitment, the line number in which the credit facility would be recorded if it were drawn. Refer to the FR Y-9C instructions for definitions of Schedule HC-C line item categories.</p> <p>If the credit facility includes multiple loans, report the integer code corresponding to the type of loan which accounts for the largest share of the credit facility committed balance.</p> <p>For fronting exposures, report the integer code corresponding to the line number on the HC-C in which the exposure would be recorded if it were drawn by the borrower.</p> <ol style="list-style-type: none"> <li>1. Loans to U.S. banks and other U.S. depository institutions (FR Y-9C, Schedule HC-C, item 2.a);</li> <li>2. Loans to foreign banks (FR Y-9C, Schedule HC-C, item 2.b);</li> <li>3. Loans to finance agricultural production and other loans to farmers (FR Y-9C, Schedule HC-C, item 3);</li> <li>4. Commercial and industrial loans to U.S. addresses (FR Y-9C, Schedule HC-C, item 4.a);</li> <li>5. Commercial and industrial loans to non-U.S. addresses (FR Y-9C, Schedule HC-C, item 4.b);</li> <li>6. Loans to foreign governments and official institutions (including foreign central banks) (FR Y-9C, Schedule HC-C, item 7);</li> <li>7. Loans to nondepository financial institutions (FR Y-9C, Schedule HC-C, item 9.a);</li> <li>8. All other loans, excluding consumer loans (FR Y-9C, Schedule HC-C, item 9.b(2));</li> </ol>	Enter number code of the description

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
			9. All other leases, excluding consumer leases (FR Y-9C, Schedule HC-C, item 10.b); 10. Loans secured by owner-occupied nonfarm nonresidential properties originated in domestic offices (FR Y-9C, Schedule HC-C, item 1.e(1)); and 11. Loans secured by owner-occupied nonfarm nonresidential properties originated in non-domestic offices (reported within FR Y-9C, Schedule HC-C, item 1).	
27	Line of Business ( <i>LineOfBusiness</i> )	CLCOK458	Provide the name of the internal line of business	Free text describing the line of business. For example: Private Banking, Corporate Banking, Asset- Based Lending, etc.  Must be consistent with line of business names as reported in Schedule H.3 (Line of Business Schedule), Field 1.

# DRAFT

IDRM	Description	Allowable Values
OG076	<p>Report the cumulative net charge-offs associated with the credit facility on the reporting entity's books.</p> <p>Cumulative net charge-offs are the amount reflected over the life of the credit facility.</p> <p>If cumulative charge-offs are greater than the current commitment balance but less than the original commitment, report the total cumulative charge-off amount even though it exceeds the current commitment.</p> <p>For disposed credit facilities, report the cumulative charge-offs as of the date of disposition.</p> <p>For fronting exposures, report the cumulative net charge-offs associated with impairment of the participant lender.</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).</p> <p>Should be 0 if there is no charge-off for the facility.</p> <p>Should be 'NA' for loans held for sale or accounted for under a fair value option.</p>
		

# DRAFT

IDRM	Description	Allowable Values
OM292	<p>Report the reserve applied to the credit facility per ASC 310-10 (formerly FAS 114, Accounting by Creditors for impairment of a loan). ASC 310-10 addresses specific reserves for impaired loans. For fronting exposures, report the scenario where collection of all unpaid principal and interest from the participant lender becomes unlikely and a specific reserve is made against the participant lender.</p> <p>If ASU 2016-13 has been adopted, report 0 for ASC 310-10 and report any applicable allowance for credit losses in field 102 (ASC 326-20).</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).</p> <p>Should be 0 if there is no ASC 310-10 reserve for the credit facility.</p> <p>For fully undrawn commitments, enter 0.</p>

# DRAFT

31	ASC310-30 (ASC31030) <sup>30</sup>	CLCOM293	<p>Report the adjustment applied to the credit facility per ASC 310-30 (formerly Statement of Position (SOP) 03-3, Accounting for Certain Loans or Debt Securities Acquired in a Transfer) that is not reflected in the allowance reported in Field 30.</p> <p>ASC 310-30 addresses the accounting for difference between contractual and expected cash flows for loans purchased with evidence of credit deterioration, which is defined in the accounting guidance as the nonaccretable difference.</p> <p>The amount referred to in this field is the remaining nonaccretable difference, less the amount of that difference that is reflected in Field 30.</p> <p>Provide if available at a credit facility level, otherwise a pro-rated allocation from the portfolio level to the loan level may be reported.</p> <p>For fronting exposures, report the adjustment applied to the credit facility per ASC 310-30 (formerly Statement of Position (SOP) 03-3, Accounting for Certain Loans or Debt Securities Acquired in a Transfer) for the participant lender.</p> <p>If ASU 2016-13 has been adopted, report 0 for ASC 310-30 and report any applicable purchased credit deteriorated noncredit discount (or premium) in field 103 (Purchased Credit Deterioration Noncredit Discount).</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).</p> <p>Should be 0 if there is no ASC310-30 Reserve for the loan. .</p> <p>For fully undrawn commitments, enter 0.</p>
32	# Days Principal or Interest Past Due	CLCOG077	<p>Report the longest number of days principal and/or interest payments are past due, if such payments are past due 30 days or more. Report the number of days past due as of the last day of the</p>	<p>Numbers only.</p> <p>For fully undrawn commitments, enter 0.</p>

# DRAFT

IDRM	Description	Allowable Values
	reporting period or disposition date. If payments are not past due 30 days or more, enter zero. For fronting exposures, report the longest number of days principal and/or interest payments are past due, if such payments are past due 30 days or more for the participant lender.	
OG078	Report the date the credit facility was placed on non-accrual, if applicable. If a non-accrual date does not exist, enter 9999-12-31. For fronting exposures, report the date the fronting facility was placed on non-accrual.	Must be in yyyy- mm-dd format, e.g.: 2005-02-01 1999-12-14  For fully undrawn commitments, enter 9999-12-31.
06135	Indicate if the credit facility is participated or syndicated among other financial institutions and if it is part of the Shared National Credit Program. For fronting exposures, report option1 'No'.	<ol style="list-style-type: none"><li>1. No</li><li>2. Yes, syndicate/participant in syndication but does not meet the definition of a Shared National Credit</li><li>3. Yes, agent in syndication or participation but does not meet the definition of a Shared National Credit</li><li>4. Yes, syndicate/participant in Shared National Credit</li><li>5. Yes, agent in Shared National Credit</li></ol>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
35	Lien Position ( <i>LienPosition</i> )	CLCOK450	<p>Indicate using integer code if the credit facility is First Lien Senior, Second Lien, Senior Unsecured, or Contractually Subordinated.</p> <p>If the facility contains loans with different lien positions, aggregate the committed balance by lien position and report the lien position associated with the predominant aggregate value.</p> <p>For fronting exposures, report the integer code that is applicable for the primary credit facility.</p>	<ol style="list-style-type: none"> <li>1. First-Lien Senior</li> <li>2. Second Lien</li> <li>3. Senior Unsecured</li> <li>4. Contractually Subordinated</li> </ol>
36	Security Type ( <i>SecurityType</i> )	CLCOM298	<p>If security is provided by collateral other than or in addition to Real Estate, indicate the predominant security type. If a credit facility has loans secured by different asset types, aggregate the committed balance by type of asset in the collateral pool and report the security type associated with the predominant aggregate value. Report the integer code corresponding to the following security type descriptions.</p> <p>Option 4 (Blanket Lien) should only be used for loans which legally give the lender a lien of equal seniority across all unencumbered assets of the borrower.</p> <p>For fronting exposures, report the integer code that is applicable for the primary credit facility.</p> <p>0 Real Estate only            1 Cash and Marketable Securities            2 Accounts Receivable and Inventory            3 Fixed Assets excluding Real Estate            4 Blanket Lien            5 Other            6 Unsecured</p>	Enter number code of the description



# DRAFT

Field No.	Field Name; (Technical Field Name)	MDRM	Description	Allowable Values
37	Interest Rate Variability <i>(InterestRateVariability)</i>	CLCOK461	<p>Indicate the variability of current interest rates (Fixed, Floating, or Mixed) to maturity.</p> <p><i>For fully undrawn commitments, report interest rate variability that would apply per the terms of the credit agreement if the credit facility was fully drawn on the reporting date. If such fully undrawn credit facility allows for either fixed or floating draws at the borrower's discretion, then report '3' (Mixed).</i></p> <p><u>For facilities where revenue is entirely fee based and no interest is or will ever be collected, enter '4' (Entirely fee based).</u></p> <p><i>For fully undrawn commitments, enter '0' (zero).</i></p> <p>For fronting exposures <del>that are not fully undrawn</del>, indicate the variability of current interest rates (Fixed, Floating, Mixed, <u>or Entirely fee based</u>) to maturity based on the rate associated with the fronting facility.</p>	<p>0. <del>Fully undrawn commitments DO NOT USE</del></p> <p>1. Fixed</p> <p>2. Floating</p> <p>3. Mixed</p> <p>4. <u>Entirely fee based</u></p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
38	Interest Rate ( <i>InterestRate</i> )	CLC07889	<p>Report the current interest rate charged on the credit facility. If the facility includes multiple draws with different interest rates, enter the dollar weighted average interest rate that approximates the overall rate on the drawn balance of the facility. Report interest rate exclusive of interest rate swaps.</p> <p style="color: #A52A2A;">For fully undrawn commitments, report the interest rate that would apply per the terms of the credit agreement if the credit facility was fully drawn on the reporting date.</p> <p style="color: #A52A2A;">For credit facilities that allow for multiple interest rates, when determining which rate to report, report the rate that was most conservative (highest) as of the most recent origination or renewal date. If the facility has been acquired more recently than the most recent origination or renewal date, report the rate that was most conservative as of the date of acquisition.</p> <p style="color: #0000FF;"><u>For entirely fee based facilities (as designated in Field 37), report 'NA'.</u></p> <p>For fronting exposures <del>that are not fully undrawn</del>, report the current interest rate charged based on the rate associated with the fronting facility.</p>	<p>Provide as a decimal, e.g.: 0.0575 for 5.75%</p> <p style="color: #0000FF;"><u>Enter 'NA' if the facility is entirely fee based.</u></p> <p style="color: #A52A2A;"><del>For fully undrawn commitments, enter 0.</del></p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
39	Interest Rate Index  ( <i>InterestRateIndex</i> )	CLCOK462	<p>For floating rate credit facilities, report the base interest rate using integer code. If obligor has an option, select the index actually in use.</p> <p>If the credit facility is fixed <u>or entirely fee based</u> (as designated in Field 37) choose the integer for “Not applicable (Fixed <u>or entirely fee based</u>)”. For credit facilities where the base interest rate is mixed, choose the integer for “Mixed.” <del>For fully undrawn commitments, enter ‘0’ (zero).</del></p> <p><i>For fully undrawn commitments, report the interest rate index that would apply if the credit facility was fully drawn on the reporting date. If such fully undrawn credit facility allows for multiple indices at the borrower’s discretion, then report the interest rate index used to calculate Field 38 (Interest Rate).</i></p> <p>For fronting exposures <del>that are not fully undrawn</del>, report this field based on the rate associated with the fronting facility.</p>	<p>0. <del>Fully undrawn commitments</del> DO NOT USE</p> <p>1. LIBOR</p> <p>2. PRIME or Base</p> <p>3. Treasury Index</p> <p>4. Other</p> <p>5. Not applicable (Fixed <u>or entirely fee based</u>)</p> <p>6. Mixed</p> <p>7. SOFR</p>

# DRAFT

Field No.	Field Name; (Technical Field Name)	MDRM	Description	Allowable Values
40	Interest Rate Spread <i>(InterestRateSpread)</i>	CLCOK463	<p>For floating rate credit facilities, report the spread over base rate in basis points.</p> <p>If the credit facility is fixed <a href="#">or entirely fee based</a> (as designated in Field 37) populate 'NA'.</p> <p>If the facility includes multiple draws with different spreads, provide the spread that approximates the overall spread on the facility.</p> <p><b>For fully undrawn commitments, report the interest rate spread that would apply per the terms of the credit agreement if the credit facility was fully drawn on the reporting date.</b></p> <p>For fronting exposures <del>that are not fully undrawn</del>, report the interest rate spread based on the rate associated with the fronting facility.</p>	<p>Provide as a decimal, e.g.: 0.0575 for 5.75%</p> <p>Enter 'NA' if the credit facility is fixed <a href="#">or entirely fee based</a></p> <p>Negative numbers can be submitted. For negative values use a negative sign '-' not parenthesis ().</p> <p><del>For fully undrawn commitments, enter 0.</del></p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
41	Interest Rate Ceiling <i>(InterestRateCeiling)</i>	CLCOK464	<p>For floating rate credit facilities, report the rate ceiling if one is contained in the credit agreement.</p> <p>If there is no ceiling, populate with 'NONE'.</p> <p>If the credit facility is fixed <u>or entirely fee based</u> (as designated in Field 37) populate 'NA'.</p> <p>For facilities with multiple interest rate ceilings, provide the maximum interest rate ceiling.</p> <p><i>For fully undrawn commitments, report the interest rate ceiling that would apply per the terms of the credit agreement if the credit facility was fully drawn on the reporting date.</i></p> <p>For fronting exposures <del>that are not fully undrawn</del>, report the interest rate ceiling based on the rate associated with the fronting facility.</p>	<p>Provide as a decimal, e.g.: 0.0575 for 5.75%</p> <p>Enter 'NA' if the credit facility is fixed <u>or entirely fee based</u></p> <p>Enter 'NONE' if no ceiling.</p> <p><del>For fully undrawn commitments, enter 0.</del></p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
42	Interest Rate Floor <i>(InterestRateFloor)</i>	CLCOK465	<p>For floating rate credit facilities, report the rate floor if one is contained in the credit agreement. If there is no floor, populate with 'NONE'.</p> <p>If the credit facility is fixed <u>or entirely fee based</u> (as designated in Field 37) populate 'NA'.</p> <p>For facilities with multiple interest rate floors, provide the minimum interest rate floor.</p> <p><i>For fully undrawn commitments, report the interest rate ceiling that would apply per the terms of the credit agreement if the credit facility was fully drawn on the reporting date.</i></p> <p>For fronting exposures <del>that are not fully undrawn</del>, report the interest rate floor based on the rate associated with the fronting facility.</p>	<p>Provide as a decimal, e.g.: 0.0575 for 5.75% Enter 'NA' if the credit facility is fixed <u>or entirely fee based</u></p> <p>Enter 'NONE' if no floor.</p> <p><del>For fully undrawn commitments, enter 0.</del></p>
43	Interest Income Tax Status <i>(TaxStatus)</i>	CLCOM299	<p>Report the tax status of interest income for Federal or State Income Tax purposes. Interest Income Tax Status should be determined by whether the interest income received by the BHC or IHC or SLHC is tax exempt (at Federal, State, etc.).</p>	<ol style="list-style-type: none"> <li>1. Taxable</li> <li>2. Tax Exempt</li> </ol> <p>If federal or state tax exempt, choose '2'.</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
44	Guarantor Flag ( <i>GuarantorFlag</i> )	CLCGM318	<p>Indicate if the credit facility is guaranteed.</p> <p>Report the option that reflects the guarantee of the guarantor identified in Field 45.</p> <p>Option 1 (Full guarantee) should be selected when there is explicit recourse for full repayment of the credit obligation by a single guarantor other than a U.S. Government Agency. For credit facilities fully guaranteed by a U.S. Government Agency, refer to the definition for option 3.</p> <p>Option 2 (Partial guarantee) should be selected when there is explicit recourse for repayment of a portion of the credit obligation. This option includes partial guarantees by a U.S. Government Agency.</p> <p>Option 3 (Full U.S. Government Agency guarantee) should only be selected when the credit facility is fully guaranteed by a U.S. Government Agency.</p> <p>Option 4 (No guarantee) should be used when there is no explicit recourse for repayment of the credit obligation.</p> <p>For fronting exposures, report the integer code that is applicable for the primary facility.</p>	<ol style="list-style-type: none"> <li>1. Full guarantee</li> <li>2. Partial guarantee</li> <li>3. U.S. Government Agency Guarantee</li> <li>4. No guarantee</li> </ol>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
45	Guarantor Internal ID ( <i>GuarantorInternalID</i> )	CLCGM300	Report the unique guarantor identifier.  For facilities with multiple guarantors, provide the unique guarantor identifier for the primary or most substantial guarantor.	Must not contain a carriage return, line feed, comma or any unprintable character.  If the credit facility is not guaranteed, enter 'NA'.
46	Guarantor Name ( <i>GuarantorName</i> )	CLCG9017	Report the guarantor name on the credit facility. Full legal corporate name is desirable. If the guarantor is an individual(s) (Natural Person (s)), do not report the name; instead substitute with the text: "Individual."  For facilities with multiple guarantors, provide the guarantor name for the primary or most substantial guarantor.	Must not contain a carriage return, line feed, comma or any unprintable character.  If the credit facility is not guaranteed, enter 'NA'
47	Guarantor TIN ( <i>GuarantorTIN</i> )	CLCG6191	Report the Taxpayer Identification Number (TIN) assigned to the guarantor by the U.S. Internal Revenue Service (IRS) in the administration of tax laws. If the guarantor is an individual(s) (Natural Person(s)), do not report Social Security Number; instead enter 'NA'. If the guarantor does not have a TIN, enter 'NA'.  For facilities with multiple guarantors, provide the TIN assigned to the primary or most substantial guarantor.	The 9 digit assigned by the Internal Revenue Service for the guarantor identified in Field 45. Allowable forms are either ##-#####, ######, or 'NA'.  If the credit facility is not guaranteed, enter 'NA'



# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
48	Guarantor Internal Risk Rating  ( <i>GuarantorInternalRiskRating</i> )	CLCGG080	Report the guarantor rating grade from the reporting entity's internal risk rating system.  This is the reporting entity's probability of default (PD) rating. If the reporting entity uses a one-dimensional risk rating system, record that rating here.  For facilities with multiple guarantors, provide the guarantor rating grade for the primary or most substantial guarantor.	Free text indicating the obligor rating grade.  If the credit facility is not guaranteed or if the guarantor does not have a rating, enter 'NA'
49	Entity Internal ID  ( <i>EntityInternalID</i> )	CLCEM300	Report the reporting BHC's or IHC's or SLHC's unique internal identifier for the entity that is the primary source of repayment for the facility in Field 15	Must not contain a carriage return, line feed, comma or any unprintable character.  Leave blank if the entity is the same as the Obligor identified in Field 2.
50	Entity Name  ( <i>EntityName</i> )	CLCE9017	Report the name of the entity that is the primary source of repayment for the facility in Field 15. Full legal corporate name is desirable. If the entity is an individual(s) (Natural Person(s)), do not report the name; instead substitute with the text: "Individual."	Must not contain a carriage return, line feed, comma or any unprintable character.  Leave blank if the entity is the same as the Obligor identified in Field 2.
51	Entity Internal Risk Rating  ( <i>EntityInternalRiskRating</i> )	CLCEG080	For the entity identified in Field 49, report the entity rating grade from the reporting BHC's or IHC's or SLHC's internal risk rating system.  This is the reporting entity's probability of default (PD) rating. If the reporting BHC or IHC or SLHC uses a one-dimensional risk rating system, record that rating here.	Free text indicating the entity rating grade.  Leave blank if the entity is the same as the Obligor identified in Field 2.

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
52	Date of Financials ( <i>DateFinancials</i> )	CLCE9999	Report the as of date of the financial information, related to the entity identified in Field 2 or Field 49, that is reported in the Obligor Financial Data Section.	Must be in yyyy- mm-dd format, e.g.: 2005-02-01 1999-12-14
53	Date of Last Audit ( <i>DateLastAudit</i> )	CLCE4929	Report the date of the last audited financial statements of the entity identified in Field 2 or Field 49. Date of last audit may or may not be the same date as the date of the financials (Field 52).  If there is no audit date, enter 9999-12-31.	Must be in yyyy- mm-dd format, e.g.: 2005-02-01 1999-12-14
54	Net Sales Current ( <i>NetSalesCurrent</i> )	CLCEM301	Report the gross sales of the entity identified in Field 2 or Field 49 reduced by cash discounts, trade discounts, and returned sales and allowances for which credit is given to customers less returns and allowances, freight out, and cash discounts allowed for the designated period.  Report data for the trailing twelve month (TTM) period ended on the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
55	Net Sales Prior Year ( <i>NetSalesPriorYear</i> )	CLCEM302	Report the gross sales of the entity identified in Field 2 or Field 49 reduced by cash discounts, trade discounts, and returned sales and allowances for which credit is given to customers less returns and allowances, freight out, and cash discounts allowed.  Report data for the trailing twelve month (TTM) period ended one year prior to the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
56	Operating Income <i>(OperatingIncome)</i>		Report the amount of profit (or loss) realized from continuing operations of the entity identified in Field 2 or Field 49; typically represented as sales less items such as cost of goods sold, operating expenses, amortization and depreciation.  Report data for the trailing twelve month (TTM) period ended on the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).
57	Depreciation & Amortization <i>(DepreciationAmortization)</i>		Report the total depreciation and amortization costs of the entity identified in Field 2 or Field 49 of tangible and intangible assets allocated against revenue for the current period.  Report data for the trailing twelve month (TTM) period ended on the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).
58	Interest Expense <i>(InterestExpense)</i>	CLCEM305	Report the periodic expense to the entity identified in Field 2 or Field 49 of securing short and long-term debt.  Report data for the trailing twelve month (TTM) period ended on the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).
59	Net Income Current <i>(NetIncomeCurrent)</i>	CLCEM306	Report the income (or loss) reported by the entity identified in Field 2 or Field 49 after expenses and losses have been subtracted from all revenues and gains for the fiscal period including discontinued operations.  Report data for the trailing twelve month (TTM) period ended on the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
60	Net Income Prior Year <i>(NetIncomePrior Year)</i>	CLCEM307	Report the income (or loss) reported by the entity identified in Field 2 or Field 49 after expenses and losses have been subtracted from all revenues and gains for the fiscal period including discontinued operations.  Report data for the trailing twelve month (TTM) period ended one year prior to the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
61	Cash & Marketable Securities <i>(CashMarketable Securities)</i>	CLCEM308	Report the cash, depository accounts and marketable securities of the entity identified in Field 2 or Field 49 that can be easily sold and readily converted into cash.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
62	Accounts Receivable (A/R) Current <i>(AccountsReceivableCurrent)</i>	CLCEM309	Report the money owed to the entity identified in Field 2 or Field 49 for merchandise or services or services sold on open account.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
63	Accounts Receivable (A/R) Prior Year <i>(AccountsReceivablePriorYear)</i>	CLCEM310	Report the money owed to the entity identified in Field 2 or Field 49 for merchandise or services or services sold on open account. Report data one year prior to date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
64	Inventory Current <i>(InventoryCurrent)</i>	CLCEM311	Report the value of the raw materials, work in process, supplies used in operations, finished goods, and merchandise bought for resale of the entity identified in Field 2 or Field 49.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
65	Inventory Prior Year <i>(InventoryPriorYear)</i>	CLCEM312	Report the value of the raw materials, work in process, supplies used in operations, finished goods, and merchandise bought for resale of the entity identified in Field 2 or Field 49  Report data one year prior to date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
66	Current Assets Current <i>(CurrentAssetsCurrent)</i>	CLCEM313	Report the cash, accounts receivable, inventory, and other assets of the entity identified in Field 2 or Field 49 that are likely to be converted into cash, sold, exchanged, or expensed in the normal course of business, usually within one year and other assets expected to be converted to cash within a year. Examples include accounts receivable, prepaid expenses, and many negotiable securities as of the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
67	Current Assets Prior Year  ( <i>CurrentAssetsPriorYear</i> )	CLCEM314	Report the cash, accounts receivable, inventory, and other assets of the entity identified in Field 2 or Field 49 that are likely to be converted into cash, sold, exchanged, or expensed in the normal course of business, usually within one year and other assets expected to be converted to cash within a year. Examples include accounts receivable, prepaid expenses, and many negotiable securities.  Report data one year prior to the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
68	Tangible Assets  ( <i>TangibleAssets</i> )	CLCEM315	Report the assets of the entity identified in Field 2 or Field 49 having a physical existence, such as cash, equipment, real estate, real property, and personal property such as buildings and machinery; accounts receivable are also usually considered tangible assets for accounting purposes. Tangible assets are distinguished from intangible assets, such as trademarks, copyrights, and goodwill, and natural resources (timberlands, oil reserves, and coal deposits).	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
69	Fixed Assets  ( <i>FixedAssets</i> )	CLCEM316	Report the tangible property of the entity identified in Field 2 or Field 49 used in the business and not for resale. This includes, but is not limited to, buildings, furniture, fixtures, equipment, and land. Report fixed assets net of depreciation.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
70	Total Assets (TA) Current <i>(TotalAssetsCurrent)</i>	CLCE2170	Report the sum of the current assets of the entity identified in Field 2 or Field 49 plus net property, plant, and equipment plus other non-current assets (including, but not limited to, intangible assets, deferred items, and investments and advances) as of the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
71	Total Assets (TA) Prior Year <i>(TotalAssetsPriorYear)</i>	CLCEM317	Report the sum of the current assets of the entity identified in Field 2 or Field 49 plus net property, plant, and equipment plus other non-current assets (including, but not limited to, intangible assets, deferred items, and investments and advances).  Report data one year prior to date reported in Field 52.	Rounded whole dollar amount, e.g.:20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
72	Accounts Payable (A/P) Current <i>(AccountsPayableCurrent)</i>	CLCE3066	Report the obligations owed to the creditors of the entity identified in Field 2 or Field 49 arising from the entity's ongoing operations, including the purchase of goods, materials, supplies, and services as of the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
73	Accounts Payable (A/P) Prior Year <i>(AccountsPayablePriorYear)</i>	CLCEM325	Report the obligations owed to the creditors of the entity identified in Field 2 or Field 49 arising from the entity's ongoing operations, including the purchase of goods, materials, supplies, and services.  Report data one year prior to date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).

# DRAFT

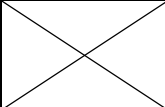
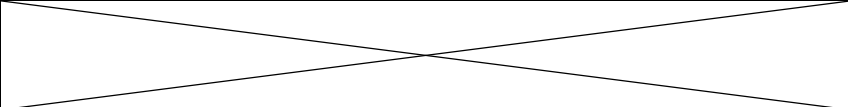
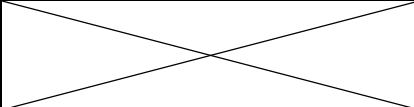
Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
74	Short Term Debt ( <i>ShortTermDebt</i> )	CLCEM319	Report the debt obligations of the entity identified in Field 2 or Field 49 with a term of less than one year.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
75	Current Maturities of Long Term Debt ( <i>CurrentMaturitiesLongTermDebt</i> )	CLCEM320	Report the portion of long-term debt of the entity identified in Field 2 or Field 49 due within one year.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
76	Current Liabilities Current ( <i>CurrentLiabilitiesCurrent</i> )	CLCEM321	Report the short-term debt, accounts payable and other current liabilities of the entity identified in Field 2 or Field 49 that are due within one year.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
77	Current Liabilities Prior Year ( <i>CurrentLiabilitiesPriorYear</i> )	CLCEM322	Report the short-term debt, accounts payable and other current liabilities of the entity identified in Field 2 or Field 49 that are due within one year.  Report data one year prior to date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).



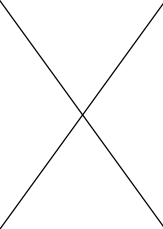
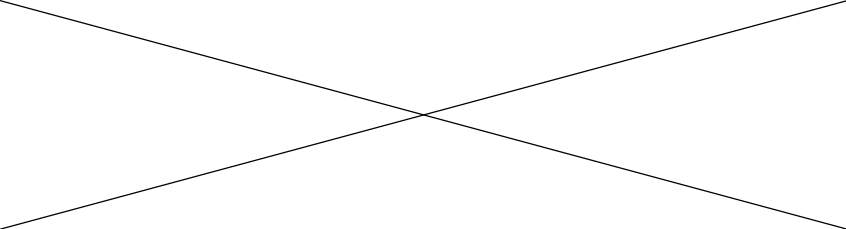
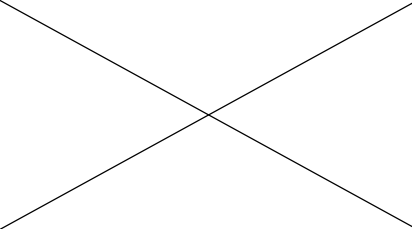
# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
78	Long Term Debt ( <i>LongTermDebt</i> )	CLCEM323	Report the liabilities of the entity identified in Field 2 or Field 49 that are due in one year or more.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
79	Minority Interest ( <i>MinorityInterest</i> )	CLCE4484	Report the interest of shareholders who, in the aggregate, own less than half the shares in a corporation. On the consolidated balance sheets of companies whose subsidiaries are not wholly owned, the minority interest is shown as a separate equity account or as a liability of indefinite term. Enter 'NA' if not applicable.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).  Enter 'NA' if not applicable.
80	Total Liabilities ( <i>TotalLiabilities</i> )	CLCE2950	Report the sum of current liabilities plus long- term debt plus other non-current liabilities (including deferred taxes, investment tax credit, and minority interest) of the entity identified in Field 2 or Field 49.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
81	Retained Earnings ( <i>RetainedEarnings</i> )	CLCE3247	Report the cumulative retained earnings of the entity identified in Field 2 or Field 49 less total dividend distributions to shareholders. Typically, it is the prior year's retained earnings plus net income less distributions.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
82	Capital Expenditures ( <i>CapitalExpenditures</i> )	CLCEM324	Report the funds used to acquire a long-term asset resulting in depreciation deductions over the life of the acquired asset. Report gross of depreciation.  Report data for the trailing twelve month (TTM) period ended on the date reported in Field 52.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).
83	Special Purpose Entity Flag ( <i>SpecialPurposeEntityFlag</i> )		Indicate '2' (Yes) if the obligor (as identified in Field 2) is organized as a bankruptcy remote, special purpose entity (SPE) where the primary source of repayment depends on the performance of specified underlying assets. Relevant SPE obligors include, ABCP conduits, securitization trusts, and other structured variable interest entities established to purchase and finance assets through the tranching of risk. Entities which are trusts for the purpose of personal wealth management or Op Co/Prop Co structures should be reported as '1' (No).	1. No 2. Yes
84	DO NOT USE			

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
85	DO NOT USE			
86	Lower of Cost or Market Flag <i>(LOCOM)</i>		Indicate whether the loan is accounted for under the fair value option or is held for sale and carried at the lower-of-cost-or-market (LOCOM). For loans not accounted for under the fair value option or not held for sale, report Option 3 (NA).	<ol style="list-style-type: none"> <li>1. LOCOM</li> <li>2. FVO</li> <li>3. NA</li> </ol>
87	SNC Internal Credit ID <i>(SNCInternalCreditID)</i>		<p>If the credit facility is reported in the Shared National Credit collection and the reporting BHC or IHC or SLHC is the lead bank/agent (option 5 in Field 34), indicate the reporting BHC's or IHC's or SLHC's Internal Credit ID as reported in the Shared National Credit collection for this credit facility as of the most recent filing date.</p> <p>If the credit facility is not reported in the Shared National Credit collection or the reporting BHC or IHC or SLHC is a participant in the Shared National Credit credit facility, report 'NA'.</p>	<p>May not contain a carriage return, line feed, comma or any unprintable character.</p> <p>Report 'NA' if the credit facility is not reported in the Shared National Credit collection or if the reporting BHC or IHC or SLHC is not the agent.</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
88	Probability of Default (PD)  ( <i>ProbabilityOfDefault</i> )		<p>For firms that are subject to the advanced approaches for regulatory capital, report the advanced IRB parameter estimate for the probability of default (PD) as defined in the Rule.</p> <p>For a defaulted obligor, report 100 percent ('1).</p> <p>For firms that are not subject to the advanced approaches for regulatory capital, report the PD estimate that corresponds to the Obligor Internal Risk Rating reported in Field 10. If the reporting entity does not assign a PD estimate to the Obligor Internal Risk Rating, report 'NA.'</p>	<p>Express as a decimal to 4 decimal places, e.g., 0.05% is 0.0005; 100% is 1. Use decimal format; do not use scientific notation.</p> <p>If the reporting entity does not assign a PD estimate to the Obligor Internal Risk Rating, report 'NA.'</p>
89	Loss Given Default  ( <i>LGD</i> )	CLCOG081	<p>For firms that are subject to the advanced approaches for regulatory capital, report the advanced IRB LGD estimate at the loan level as defined in the Rule. If the credit facility includes multiple loans with different LGD assignments, report the dollar weighted average LGD that approximates the overall LGD on the committed balance of the credit facility.</p> <p>For firms that are not subject to the advanced approaches for regulatory capital, report the credit facility LGD estimate from the reporting entity's credit risk management system. If an LGD estimate is not assigned, report 'NA.'</p>	<p>Express as a decimal to 4 decimal places, e.g., 0.05% is 0.0005. Use decimal format; do not use scientific notation.</p> <p>If the reporting entity does not assign a credit facility LGD estimate, report 'NA.'</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
90	Exposure At Default  ( <i>EAD</i> )		<p>For firms that are subject to the advanced approaches for regulatory capital, report the advanced IRB parameter estimate for the Exposure at Default (EAD). If the credit facility includes multiple loans with different EAD assignments, report the dollar weighted average EAD that approximates the overall EAD on the committed balance of the credit facility.</p> <p>For firms that are not subject to the advanced approaches for regulatory capital, report the credit facility EAD estimate from the reporting entity's internal credit risk management system. If an EAD estimate is not assigned, report 'NA.'</p>	<p>Rounded whole dollar amount with no cents, e.g.: 20000000</p> <p>Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).</p> <p>If the reporting entity does not assign a credit facility EAD estimate, report 'NA'.</p>
91	Renewal Date  ( <i>RenewalDate</i> )		<p>If the credit facility has been renewed per the terms of the original loan agreement, re-priced, or has a change in the maturity date such that the Origination Date did not change, report the date on which the most recent renewal notification became effective. The Renewal Date is intended to capture maturity date extensions provided to the obligor by the BHC or IHC or SLHC and extension options at the sole discretion of the borrower. If a credit facility has been renewed as part of a major modification such that the contractual date of the original loan is changed, then such date would be reported in Field 18 (Origination Date) and the BHC, IHC and SLHC should report 9999-12-31 in this field. If the credit facility has not been renewed the BHC, IHC and SLHC should report 9999-12-31 in this field.</p>	<p>Must be in yyyy-mm-dd format, e.g.:</p> <p>2005-02-01 1999-12-14</p>

# DRAFT

<b>Field No.</b>	<b>Field Name; (Technical Field Name)</b>	<b>MDRM</b>	<b>Description</b>	<b>Allowable Values</b>
92	Credit Facility Currency <i>(CreditFacilityCurrency)</i>		<p>Indicate the currency denomination for contractual principal and interest payments on the credit facility, using the relevant three-letter ISO 4217 currency code.</p> <p>If payments are legally permitted or required in more than one currency, indicate the predominant currency for contractual credit facility payments.</p> <p>For the avoidance of doubt, whether or not the currency denomination of the credit facility is USD (US Dollars), all amounts reported in other fields of this schedule must be in terms of US Dollars.</p> <p>The predominant currency should be the currency which represents the predominant share of the credit facility committed balance.</p>	Standard ISO 4127 three-letter currency codes available at <a href="http://www.iso.org/iso/currency_codes">http://www.iso.org/iso/currency_codes</a>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
93	Collateral Market Value  ( <i>CollateralMarketValue</i> )		For facilities which require ongoing or periodic valuation of the collateral, report the market value of the collateral as of the reporting date. If the market value of collateral is not updated in the reporting entity's internal risk management systems as of the reporting date, report NA.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).  Report 'NA' if the market value of collateral is not updated in the reporting entity's internal risk management systems as of the reporting date.
94	Prepayment Penalty Flag  ( <i>PrepaymentPenaltyFlag</i> )		Indicate whether the credit facility has a prepayment penalty clause in effect which may include yield maintenance. Indicate option 1 (Yes) if the credit facility currently has a prepayment penalty clause in effect. If the facility had a prepayment penalty clause that has since expired, report option 2. If the facility does not have a prepayment penalty clause, report option 3.	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. The prepayment penalty has expired</li> <li>3. No prepayment penalty clause</li> </ol>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
95	Entity Industry Code  ( <i>EntityIndustryCode</i> )		<p>Report the numeric code that describes the primary business activity of the entity identified in Field 49 according to the North American Industry Classification System (NAICS). If the NAICS code is not available, provide either the Standard Industrial Classification (SIC), or Global Industry Classification Standard (GICS).</p> <p>If the entity identified in Field 49 is an individual, the industry code should be consistent with the industry in which the commercial purpose of the loan operates.</p> <p>If the business or individual operates in multiple industries, the BHC, IHC and SLHC should report the industry that best represents the commercial risk of the loan (i.e., the predominant industry).</p>	Report 4 to 6 digit number. If this code is not available, then provide a SIC or GICS industry code.
96	Participation Interest  ( <i>ParticipationInterest</i> )		<p>For participated or syndicated credit facilities that have closed and settled, report the percentage of the total loan commitment held by the BHC or IHC or SLHC.</p> <p>If the credit facility is not participated or syndicated, report 1.</p> <p>If the credit facility is syndicated and reported as options 1, 2, or 3 in Field 100, report NA.</p> <p>For fronting exposures, report 1.</p>	<p>Express as a decimal to 4 decimal places, e.g., 0.05% is 0.0005. Use decimal format; do not use scientific notation.</p> <p>Report NA if the credit facility is reported as options 1, 2, or 3 in Field 100.</p> <p>For fronting exposures, report 1.</p>



# DRAFT

<b>Field No.</b>	<b>Field Name; (Technical Field Name)</b>	<b>MDRM</b>	<b>Description</b>	<b>Allowable Values</b>
97	Leveraged Loan Flag  <i>(LeveragedLoan Flag)</i>		Indicate '2' (Yes) if the credit facility is defined as a leveraged loan per criteria in the reporting entity's internal risk management framework developed pursuant to SR 13-3 (Interagency Guidance on Leveraged Lending).	1. No 2. Yes

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
98	Disposition Flag  ( <i>DispositionFlag</i> )		<p>Report the disposition method for any credit facility that was disposed during the reporting period.</p> <p>If the BHC or IHC or SLHC is still pursuing payment of principal, interest or fees, report as option "0". Rebookings/restructures where loan amounts are transferred or combined between obligations should be reported as either option 1 (Payoff) or option 2 (Involuntary payoff) depending on the occurrence of default.</p> <ol style="list-style-type: none"> <li>0. Active - Report for all credit facilities required to be reported in this data collection and do not meet the definitions of options 1 through 8 as of the reporting date.</li> <li>1. Payoff – Report all instances where the credit facility has been paid in full by the borrower, or where an undrawn credit facility reaches maturity and is not renewed.</li> <li>2. Involuntary Payoff – Report all instances where the credit facility has been paid in full after the occurrence of default per the terms of the credit agreement.</li> <li>3. Involuntary Liquidation – Report all instances where the credit facility has been liquidated either through foreclosure proceedings or another settlement option resulting in incomplete repayment of principal. Include short-sales, charge-offs, as well as REO. This includes loans active in the period prior to the reporting period that were sold at a foreclosure sale and taken into REO in the reporting period. Also include all instances where credit has been resolved (i.e. no longer pursuing collection) but not through foreclosures, servicing transfers, or payments made by the obligor.</li> </ol>	<ol style="list-style-type: none"> <li>0. Active</li> <li>1. Payoff</li> <li>2. Involuntary Payoff</li> <li>3. Involuntary Liquidation</li> <li>4. Sold or fully participated</li> <li>5. Fully syndicated</li> <li>6. Below reporting threshold</li> <li>7. Transfer to another Y-14 schedule</li> <li>8. Expired Commitment to Commit</li> </ol>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
			<ol style="list-style-type: none"> <li>4. Sold or fully participated – Report all instances where the loan has been sold or fully participated to another institution during the reporting period. For fully syndicated loans, report option 5 (Fully syndicated).</li> <li>5. Fully Syndicated – Report all instances where 100% of the commitment has been syndicated to other institutions during the reporting period.</li> <li>6. Below reporting threshold – Report all instances where the credit facility fell below the \$1 million reporting threshold.</li> <li>7. Transfer to another Y-14 schedule. Indicate the schedule where the credit facility is now reported in Field 99 below.</li> <li>8. Expired Commitment to Commit</li> </ol>	
99	Disposition Schedule Shift  ( <i>DispositionScheduleShift</i> )		<p>For credit facilities reported with option 7 (Transfer to another Y-14 schedule) in field 98, indicate the Y-14 report, schedule, and subschedule to which the credit facility shifted.</p> <p>The reported format should follow these examples:</p> <p>If the credit facility transferred to FR Y-14Q Schedule H.2 Commercial Real Estate, report “Q.H.2”.</p> <p>If the credit facility transferred to FR Y-14M Schedule D.1 Domestic Credit Card Data Collection Data Dictionary, report “M.D.1”.</p>	<p>Report in the format using the examples below:</p> <p>If the credit facility transferred to FR Y-14Q Schedule H.2 Commercial Real Estate, report “Q.H.2”.</p> <p>If the credit facility transferred to FR Y-14M Schedule D.1 Domestic Credit Card Data Collection Data Dictionary, report “M.D.1”.</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
100	Syndicated Loan Flag  <i>SyndicatedLoan Flag</i>		<p>Report whether the syndicated loan commitment is single signed by the BHC or IHC or SLHC, counter signed by the borrower (dual signed), or closed but not yet settled, or closed and settled. Closed and settled refers to the final phase where loan documents are fully executed and binding with post-closing selldown to all participants complete.</p> <p>Loans which have closed but are still pending execution of final documentation by all syndicate participants should be reported as option 3 (Closed but not settled).</p> <p>For loans that are not syndicated, indicate option 0 (NA).</p>	<ul style="list-style-type: none"> <li>0. NA</li> <li>1. Single-signed</li> <li>2. Dual-signed</li> <li>3. Closed but not settled</li> <li>4. Closed and settled</li> </ul>
101	Target Hold  <i>(TargetHold)</i>		<p>For loans in the syndicated loan pipeline (Options 1, 2 or 3 in Field 100), report the percentage of the total commitment the BHC or IHC or SLHC intends to hold.</p> <p>If the credit facility is reported as option 0 (NA) or option 4 (closed and settled) in Field 100, report NA.</p>	<p>Express as a decimal to 4 decimal places, e.g., 0.05% is 0.0005. Use decimal format; do not use scientific notation. Report NA if the credit facility is reported as option 0 or 4 in Field 100.</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
102	ASC326-20 <sup>31</sup>  (ASC32620)		<p>Report the allowance for credit losses per ASC 326-20.</p> <p>Provide at the credit facility level if available, otherwise report a pro-rated allocation from the collective (pool) basis.</p> <p>Provide if available at a credit facility level, otherwise a pro-rated allocation from the collective (pool) level to the loan level may be reported.</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting such as dollar sign, commas or decimals.</p> <p>Should be 0 if there is no ASC326-20 Reserve for the loan.</p>
103	Purchased Credit Deteriorated Noncredit Discount  (PCDNoncreditDiscount)		<p>If the facility is a purchased credit-deteriorated (PCD) asset, report the noncredit discount (or premium) resulting from its acquisition (ASC 326-20-30-13). Provide at the credit facility level if available, otherwise report a pro-rated allocation from the collective (pool) basis.</p> <p>Leave blank if the facility is not considered a PCD asset.</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting such as no dollar sign, commas or decimals.</p>

<sup>31</sup> Only institutions that have adopted ASU 2016-13 should report items 102, 103 and 104.

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
104	Current Maturity Date ( <i>CurrentMaturityDate</i> )		<p>Report the maturity date as the last date upon which the funds must be repaid, exclusive of extension options.</p> <p>For demand loan, enter '9999-01-01'. For corporate loans in the syndicated pipeline, until the syndicated loan is reported as closed and settled (option4 in Field 100), report the estimated maturity date based on the tenor stated in the commitment letter.</p> <p>For commitments to commit which are not syndicated, report the estimated maturity date based on the tenor in the terms extended to the borrower.</p>	<p>Must be in yyyy- mm-dd format, e.g.:</p> <p>2005-02-01</p> <p>1999-12-14</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
105	Committed Exposure Global Par Value		<p>For held for sale loans and loans accounted for under a fair value option, report the total commitment amount as the amount the obligor is contractually allowed to borrow according to the credit agreement for the entire credit facility.</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).</p> <p>For negative values use a negative sign '-', not parentheses ().</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
106	Utilized Exposure Global Par Value		<p>For held for sale loans and loans accounted for under a fair value option, report the outstanding funded exposure.</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).</p> <p>For negative values use a negative sign '-', not parentheses ().</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>



# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
107	Committed Exposure Global Fair Value		<p>For held for sale loans and loans accounted for under a fair value option, report the fair value of the entire credit facility.</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).</p> <p>For negative values use a negative sign '-', not parentheses ().</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
108	Utilized Exposure Global Fair Value		<p>For held for sale loans and loans accounted for under a fair value option, report the fair value of the outstanding funded exposure.</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).</p> <p>For negative values use a negative sign '-', not parentheses ().</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>
109	Obligor LEI (ObligorLEI)		<p>Report the Legal Entity Identifier (LEI) of the obligor identified in field 2, if available. A LEI is a 20 character alphanumeric code that uniquely identifies legally distinct entities that engage in financial transactions. LEIs are issued by Local Operating Units (LOUs) of the Global LEI System. If LEI does not apply, enter 'NA'.</p>	<p>Must be a valid 20 character alphanumeric LEI issued by a LOU of the Global LEI System, or 'NA'.</p>

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM	Description	Allowable Values
110	Primary Source of Repayment LEI (PSRLEI)		If the primary source of repayment is provided by an entity that is different from the obligor identified in field 2, report the Legal Entity Identifier (LEI) of the entity identified in field 49, if available. A LEI is a 20 character alphanumeric code that uniquely identifies legally distinct entities that engage in financial transactions. LEIs are issued by Local Operating Units (LOUs) of the Global LEI System. If LEI does not apply, enter 'NA'.	Must be a valid 20 character alphanumeric LEI issued by a LOU of the Global LEI System, or 'NA'.  Leave blank if the entity is the same as the Obligor identified in Field 2.

# DRAFT

## H.2 – Commercial Real Estate Schedule

### **A. Loan Population**

The loan population includes Commercial real estate (CRE) loans and leases that are held for investment (HFI) (as defined in the FR Y-9C, Schedule HC-C General Instructions) and held for sale (HFS) as of the report date (e.g. quarter or month end). Include HFI and HFS loans that the holding company has elected to report at fair value under the fair value option. Exclude all loans and leases classified as trading (reportable on the FR Y-9C, Schedule HC, item 5).

CRE loans and leases are defined as loan commitments or credit facilities to an obligor as defined in the credit agreement. Include all CRE loans and leases that are at the consolidated BHC, IHC and SLHC level and not just those of the banking subsidiaries, as well as any unused commitments that are reported in Schedule HC-L that would be reported in the relevant FR Y-9C category (as outlined below) if such loans were drawn (including all undrawn commitments extended to non-consolidated variable interest entities and commitments to commit as defined in the FR Y-9C).

In addition to CRE loans that are currently active as of the reporting date, the loan population should also include CRE loans that were disposed of during the reporting period. For purposes of this schedule, refer to Field 61 (Disposition Flag) for specific instructions on instances of disposed CRE loans to leases.

Include all CRE loans and leases with a committed balance greater than or equal to \$1 million. Although certain CRE loans and leases with a committed balance under \$1 million are not reported on the FR Y-14Q CRE schedule, the sum of the outstanding balance of these loans would be included in the relevant fields on the FR Y-14Q Supplemental Schedule and the FR Y-14A Summary Schedule pursuant to the applicable instructions of those schedules.

All CRE loans included in this schedule must be secured by real estate (as defined in the FR Y-9C Glossary entry for “loans secured by real estate”). Loans to finance CRE but not secured by CRE do not meet the definition of “loans secured by real estate” and should not be reported on the CRE Schedule. For example, a line of credit issued for the purpose of acquiring real estate that is not currently secured by real estate would not be considered secured by real estate for purposes of this Schedule. In this case, the commitment is an unsecured corporate loan until the balance is actually lent out and secured by CRE property. At that point, the commitment becomes a CRE loan for purposes of this Schedule.

In general, use loan classifications on the FR Y-9C, Schedule HC-C as a guide to determining the population of CRE loans and leases. Refer to the FR Y-9C, Schedule HC-C instructions for specific guidance on loan classifications. In determining loan classifications, look to the security, borrower, or purpose of the loan. Below is a list of FR Y-9C, Schedule HC-C categories of loans secured by real estate that are considered CRE loans and leases:

- i. 1-4 family residential construction loans originated in domestic offices (FR Y-9C, Schedule HC-C, item 1.a(1)) and in non-domestic offices (reported within FR Y-9C, Schedule HC-C, item 1);
- ii. Other construction loans and all land development and other land loans originated in domestic offices (FR Y-9C, Schedule HC-C, item 1.a(2)) and in non-domestic offices (reported within FR Y-9C, Schedule HC-C, item 1);
- iii. Loans secured by multifamily (5 or more) residential properties originated in domestic offices (FR Y-9C, Schedule HC-C, item 1.d) and in non-domestic offices (reported within FR Y-9C, Schedule HC-C, item 1);
- iv. Loans secured by other nonfarm nonresidential properties originated in domestic offices (FR Y-9C, Schedule HC-C, item 1.e(2)) and in non-domestic offices (reported within FR Y-9C, Schedule HC-C, item 1);

# DRAFT

Loans secured by owner-occupied nonfarm nonresidential properties should be reported on the FR Y-14Q Corporate Loans Schedule. Loans secured by owner-occupied nonfarm nonresidential properties are those nonfarm nonresidential property loans for which the primary source of repayment is the cash from the ongoing operations and activities conducted by the party, or an affiliate of the party, who owns the property. Thus, for loans secured by owner-occupied nonfarm nonresidential properties, the primary source of repayment is not derived from third party, nonaffiliated, rental income associated with the property (i.e., any such rental income is less than fifty percent (50%) of the source of repayment) or the proceeds of the sale, refinancing, or permanent financing of the property. Consequently, such loans are considered corporate loans rather than CRE loans.

The population of loans should be reported at the credit facility level. For purposes of the CRE Schedule, a credit facility is defined as a credit extension to a legal entity under a specific credit agreement. The credit facility may allow for multiple extensions of credit (or draws) with unique borrowing terms such as interest rate or repayment date; however, ultimately, the aggregation of such extensions of credit are governed under one common credit agreement. The \$1 million dollar reportability threshold applies to any set of commitments where the sum of those commitments, governed under one common credit agreement, is greater than or equal to \$1 million. These criteria are the same for all extensions of credit. Borrowers may have multiple facilities from the same bank. Each facility should be reported separately, but multiple draws within a facility should be consolidated at the facility level.

Credit facilities containing loans which fall under one or more of the FR Y-9C line items outlined above should be reported on the FR Y-14Q CRE schedule at the credit facility level. For credit facilities also containing loans reported on FR Y-9C line items not outlined above, the underlying loans should be aggregated and reported on the respective FR Y-14Q schedules based on the relevant schedule instructions. For example, consider a credit facility which has the following loans:

Loan 1: \$2 million committed balance reported on FR Y-9C, Schedule HC-C, item 4.a

Loan 2: \$1 million committed balance reported on FR Y-9C, Schedule HC-C, item 4.b

Loan 3: \$500,000 committed balance reported on FR Y-9C, Schedule HC-C, item 1.e(1)

Loan 4: \$500,000 committed balance reported on FR Y-9C, Schedule HC-C, item 1.d

The BHC, IHC and SLHC should aggregate loans 1, 2, and 3 and report one facility with a \$3.5 million committed balance on the FR Y-14Q Corporate Loan schedule and one facility with a \$500,000 committed balance on the FR Y-14Q Commercial Real Estate schedule. **Note that all loans within the facility are reported, including those under the credit facility threshold.** In the above example, the \$500,000 committed balance is reported on the FR Y-14Q CRE schedule because of the overall facility commitment is greater than \$1 million.

## B. Instructions for Cross Collateralized Loans

As discussed above, the entire Schedule should be completed for CRE loans with a committed balance greater than or equal to \$1 million. However, CRE loans with balances less than \$1 million are subject to a limited data collection if they are cross collateralized with a CRE loan with a committed balance greater than or equal to \$1 million. For purposes of this schedule, cross-collateralized loans are those in which the collateral securing one loan is also used as collateral for other loans, even if that loan has less than \$1 million committed balance. Cross collateralized loans that are not CRE loans should be excluded (i.e. home loan). A single loan secured by multiple properties is not considered to be cross-collateralized for purposes of this schedule. Lien position does not impact determinations of whether loans are cross-collateralized.

# DRAFT

Under this limited data collection, report the following fields for cross collateralized CRE loans with balances less than \$1 million:

- i. Field 1, Loan Number;
- ii. Field 3, Outstanding Balance;
- iii. Field 5, Committed Exposure Global;
- iv. Field 44, Cross Collateralized Loan Numbers

Reporting of all other fields for cross collateralized loans with balances less than \$1 million is optional.

## **C. Reporting Specifications**

Report all loan and lease financing receivables consistent with the FR Y-9C instructions. Report the amortized cost for HFI loans and the lower of cost or fair value for HFS loans. Report at fair value all HFS and HFI loans that the firm has elected to report under a fair value option.

For acquired loans (see Field 36), report data retrievable from loan accounting systems of record reported on a prospective basis.

All dollar amounts should represent only the consolidated holding company's pro-rata portion of portion of any syndicated or participated loan.

All amounts should be reported in U.S. dollars.

## **D. Data Format**

Data should be provided in a single extensible markup language file (.xml). No quotation mark should be used as text identifiers. Do not use header or a row count. This file will contain one record per active loan in the contributor's inventory. For fields that the schedule specifies as a date, but the XSD specifies as a datetime, provide T00:00:00 as the time.

## **E. Commercial Real Estate Data Fields**

The table on the following pages shows the fields that should be contained in the submission file. Report all fields with data as of the report date.

For disposed CRE loans, report all Fields as of the date of disposition, unless otherwise instructed in individual Field descriptions.

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
1	Loan Number ( <i>LoanNumber</i> )	G063	Report the reporting - entity's unique internal identifier for this credit facility record as of the most recent filing date. It must identify the credit facility for its entire life and must be unique.  In the event the Loan Number changes (i.e., loan was converted to a new system through migration or acquisition), also provide Original/Previous Loan Number in Field 35.	Must be unique within a submission and over time. That is, the same submission file must not have two facilities with the same Loan Number.  May not contain a carriage return, line feed, comma or any unprintable character.	Mandatory
2	Obligor Name ( <i>ObligorName</i> )	9017	Report the obligor name on the loan. Full legal entity name is desirable, but the precise name is not necessary if it requires manual intervention to provide. If the borrowing entity is an individual (s) (Natural Person (s)), do not report the name; instead substitute with the text: "Individual"	Must not contain a vertical bar ( , ASCII 7C), carriage return, line feed, comma or any unprintable character.	Mandatory
3	Outstanding Balance <sup>32</sup> ( <i>OutstandingBalance</i> )	K448	Report all loan and lease financing receivables consistent with the FR Y-9C instructions. Report the amortized cost for HFI loans and the lower of cost or fair value for HFS loans. Report at fair value all HFS and HFI loans that the firm has elected to report under a fair value option .  <a href="#">For fully undrawn commitments, report 0 (zero).</a>  For disposed credit facilities, report 0 (zero).	Rounded whole dollar amount with no cents, e.g.: 20000000  Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).	Mandatory
4	Line Reported on FR Y-9C ( <i>LineReportedOnFRY9C</i> )	K449	Report the integer code (see Allowable Values column) corresponding to the line number on the FR Y-9C, HC-C, in which the outstanding balance is recorded, or in the case of unused commitments, the line number in which the CRE Loan would be	1. 1-4 family residential construction loans originated in domestic offices (FR Y-9C, Schedule HC-C, item 1.a(1)).	Mandatory

<sup>32</sup> Institutions that have adopted ASU 2016-13 should also refer to the specifications in the FR Y-9C for reporting this item.

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			<p>recorded if drawn.</p> <p>Option 7 is a component of a broader FR Y-9C line.</p> <p>Refer to the FR Y-9C instructions for definitions of Schedule HC-C line item categories.</p> <p>If the credit facility includes multiple loans, report the integer code corresponding to the type of loan which accounts for the largest share of the credit facility committed balance.</p>	<ol style="list-style-type: none"> <li>2. Other construction loans and all land development and other land loans originated in domestic offices (FR Y-9C, Schedule HC-C, item 1.a(2)).</li> <li>3. Loans secured by multifamily (5 or more) residential properties originated in domestic offices (FR Y-9C, Schedule HC-C, item 1.d).</li> <li>4. DO NOT USE.</li> <li>5. Loans secured by other nonfarm nonresidential properties originated in domestic offices (FR Y-9C, Schedule HC-C, item 1.e(2)).</li> <li>6. DO NOT USE.</li> <li>7. Loans secured by CRE originated by non- domestic offices as reported within FR Y-9C, Schedule HC-C, item 1, excluding nonfarm nonresidential, owner occupied loans originated in nondomestic offices.</li> </ol>	
5	Committed Exposure Global <sup>33</sup>	G074	Report the total commitment amount as the sum of loan and lease financing receivables recorded in FR Y-9C, Schedule HC-C (reported in Field 3) and any unused portion of the commitment recorded in	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any</p>	Mandatory

<sup>33</sup> Institutions that have adopted ASU 2016-13 should also refer to the specifications in the FR Y-9C for reporting this item.



# DRAFT

Field No.	Field Name; (Technical Field Name)	MDRM (CRED)	Description	Allowable Values	Mandatory/Optional
	<i>(CommittedBalance)</i>		<p>Schedules HC-F, HC-G, and HC-L. For facilities with multiple lenders, only provide the reporting entity's pro-rata commitment, net of the above noted adjustments.</p> <p>For commitments to commit, report the total commitment amount approved and offered to the borrower.</p>	non-numeric formatting (no dollar sign, commas or decimal).	
6	Cumulative Charge-offs <i>(CumulativeChargeoffs)</i>	G076	<p>Report the cumulative net charge-offs associated with this CRE loan on the reporting entity's books.</p> <p>Cumulative net charge-offs are the amount reflected over the life of the credit facility.</p> <p>If cumulative charge-offs are greater than the current commitment balance but less than the original commitment, report the total cumulative charge-off amount even though it exceeds the current commitment.</p> <p>For disposed loans, report the cumulative charge-offs as of the date of disposition.</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).</p> <p>Should be '0' (zero) if there is no charge-off for the facility.</p> <p>Should be 'NA' for loans held for sale or accounted for under the fair value option.</p>	Mandatory
7	Participation Flag <i>(ParticipationFlag)</i>	6135	<p>Indicate if the CRE Loan is participated or syndicated among other financial institutions and if it is part of the Shared National Credit Program.</p> <p>For fronting exposures, report option1 'No'.</p>	<ol style="list-style-type: none"> <li>1. No</li> <li>2. Yes, syndicate/participant in syndication but does not meet the definition of a Shared National Credit</li> <li>3. Yes, agent in syndication but does not meet the definition of a Shared National Credit sold by reporting BHC or IHC or SLHC</li> </ol>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
				4. Yes, syndicate/participant in Shared National Credit 5. Yes, agent in Shared National Credit	
8	Lien Position ( <i>LienPosition</i> )	K450	<p>Indicate using integer code if the mortgage is a first lien on the property or a subordinate lien. For multiple properties, report the lien on the predominant property. The predominant property should be the one with the highest collateral value. If no property predominates, then report integer code for "Mixed Liens". For loans secured by a pledge of partnership interests, indicate a subordinate lien position.</p> <p>A "B-Note" is a structurally subordinated position secured by a senior lien on a property.</p>	1. First Lien 2. Subordinated Lien 3. Mixed Liens 4. DO NOT USE. 5. "B-Note"	Mandatory
9	Property Type ( <i>PropertyType</i> )	K451	<p>If the CRE Loan is secured by multiple property types and one predominates, indicate the predominant property type. The predominant property should be the one with the highest collateral value as of the last valuation date (Field 43).</p> <p>If the CRE Loan is secured by multiple property types and no single one predominates, indicate integer code for "Mixed".</p> <p>If the loan is secured by a property type which is not included in the above list, then indicate integer code for "Other" (e.g., skilled nursing, self-storage, etc.).</p> <p>If the CRE Loan commitment covers ONLY the land and lot development phase, then report as "Land</p>	1. Retail 2. Industrial / Warehouse 3. Hotel / Hospitality/Gaming (including Resorts) 4. Multi-family for Rent (including low income housing) 5. Homebuilders except condo 6. Condo/Co-op 7. Office 8. Mixed 9. Land and Lot Development 10. Other	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			and Lot Development." If however, the CRE Loan commitment is for land development AND vertical construction, report it under the appropriate category (e.g. Homebuilders, condo, office).		
10	Origination Date  ( <i>OriginationDate</i> )	9912	<p>Report the origination date. The origination date is the contractual date of the credit agreement. (In most cases, this is the date the commitment to lend becomes a legally binding commitment). If there has been a major modification to the loan such that the obligor executes a new or amended and restated credit agreement, use the revised contractual date of the credit agreement as the origination date. The following independent examples would generally not result in a change in the contractual date of the loan, and thus would not be considered major modifications: (1) extension options at the sole discretion of the borrower; (2) covenants; (3) waivers; (4) change in the maturity date; (5) re-pricing; (6) periodic credit reviews; or (7) loans reported as a Troubled Debt Restructuring in Field 49. Additionally, exclude all renewals which meet the definition in the 'Renewal Date' Field 54.</p> <p>The date given here should be the same date that is used for the data given in fields 12 and 13.</p> <p>For commitments to commit, report the date on which the BHC or IHC or SLHC extended terms to the borrower.</p>	<p>Must be in yyyy-mm-dd format, e.g.:</p> <p>2005-02-01 1999-12-14</p> <p>Must be before or equal to the period end date of the data.</p>	Mandatory
11	Location  ( <i>Location</i> )	K453	Report the five-digit ZIP Code for locations within the 50 US states, Washington DC, Puerto Rico, the US Virgin Islands, Guam, Palau, Micronesia, the	For locations within the US states, Washington DC, Puerto Rico, the US Virgin Islands, Guam, Palau,	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			<p>Northern Marianas, of the Marshall Islands where the collateral is located.</p> <p>Use the 2 letter Country Code<sup>34</sup> for foreign properties.</p> <p>If one CRE Loan is secured by multiple properties and one location predominates, specify that location. The predominant property should be the one with the highest collateral value as of the last valuation date (Field 43). Otherwise indicate "Multiple."</p>	<p>Micronesia, the Northern Marianas, or the Marshall Islands: five-digit ZIP code. If the ZIP code begins with zeroes, leading zeroes must be specified with no punctuation.</p> <p>For other countries, the 2-letter country code.</p> <p>For multiple properties without one predominating, use "Multiple".</p>	
12	Net Operating Income at Origination  ( <i>NetOperating Income</i> )	K454	<p>Report the Net Operating Income (NOI) at origination (date given in Field 10). NOI is all operating income, net of operating expenses with the exception of debt service and depreciation. Operating expenses include RE taxes (but not income taxes), Insurance, common area maintenance, utilities, replacement reserves, management fees, admin/accounting/legal.</p> <p>For land and construction loans that are (1) not generating income; and (2) not cross-collateralized with another property generating income, populate with 'NA'.</p> <p>The NOI should represent the financial information submitted by the borrower to the bank as part of the underwriting decision at origination, which may or may not be the same operating information used in the appraisal. The actual vacancy at time of</p>	<p>Rounded whole dollar amount with no cents, e.g.: 20000000</p> <p>Supply numeric values without any non-numeric formatting such as dollar signs, commas or decimals but negative numbers can be submitted. For negative values use a negative sign '-' not parenthesis ().</p> <p>Guidelines for populating:</p> <ul style="list-style-type: none"> <li>• '0' (zero) is to be used if the NOI is actually zero.</li> <li>• NA is to be used if the loan is a land and construction loan (i.e. 1-4 family residential construction loans reported</li> </ul>	Mandatory

<sup>34</sup> See link below for list of ISO standard country codes: [http://www.iso.org/iso/country\\_codes/iso\\_3166\\_code\\_lists/country\\_names\\_and\\_code\\_elements.htm](http://www.iso.org/iso/country_codes/iso_3166_code_lists/country_names_and_code_elements.htm)

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			<p>origination for all completed projects should already be a part of the actual financial information submitted by the borrower. Replacement reserves, if allocated by the borrower on the operating statement, should be deducted from operating income to arrive at the NOI.</p> <p>The NOI should represent the best estimate of actual NOI at the date given in Field 10. If there has been significant recent leasing activity, then rent roll (less expenses) annualized may be the best NOI number. If there is seasonality in the numbers, then actual fiscal or trailing twelve months NOI may be the best number. However, NOI should not be forward looking in the sense of being based on potential future leasing or sales activity. The NOI for loans originated for the purpose of construction that are currently generating income should be reported as the actual NOI from operating information obtained from the borrower.</p> <p>If a participation, prorate based on your share of the credit. For loans that are cross-collateralized at origination (date given in Field 10), the NOI provided should represent the total NOI available to service the debt from the underlying collateral pool. For the purposes of Field 12 only, for loans that are cross-collateralized after origination (date given in Field 10), the NOI provided should be the total NOI available at origination, not the subsequently combined NOI from the collateral pool.</p> <p>NOI is a loan level concept that represents the sum of the NOIs of all of the properties that secure the loan. If the BHC or IHC or SLHC has one loan secured</p>	<p>in FR Y-9C, Schedule HC-C, item 1.a (1) or other construction and land development loan reported in FR Y-9C, Schedule HC-C, item 1.a(2)) that is (1) not currently generating income, and (2) not cross-collateralized with another property currently generating income.</p> <ul style="list-style-type: none"> <li>Numeric values are to be used for facilities where the NOI is applicable and available.</li> </ul>	

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			<p>by multiple properties, the NOI reported should be the sum of the NOI generated by the individual properties</p> <p>For cross-collateralized loans, the NOI provided should represent the total NOI from the underlying collateral pool. Therefore, the same NOI value should be reported for each of the cross-collateralized loans. Likewise, if the cross-collateralization group includes both construction and non-construction facilities, the same NOI should be reported for each of these cross-collateralized facilities.</p>		
13	Value at Origination <i>(ValueatOrigination)</i>	M148	<p>Report the value of the subject property at origination (date given in Field 10) the value may be either from an appraisal or an evaluation depending on legal (12 CFR 34) and bank policy requirements.</p> <p>Value is prorated based on the bank's ownership interest in a facility. If a loan is secured by multiple properties, report the sum of all property values as adjusted for prorated participations. In cases of cross-collateralization, provide the sum of all property values as adjusted for prorated participations.</p>	<p>Rounded whole dollar amount with no cents, e.g.: 20000000</p> <p>Supply numeric values without any non-numeric formatting such as dollar signs, commas or decimals.</p>	Mandatory
14	Value Basis <i>(ValueBasis)</i>	K456	<p>Provide integer code if the Value in Field 13 was calculated using an "as is," "as stabilized" or "as completed" value as defined in SR10-16</p> <p>(<a href="http://www.federalreserve.gov/boarddocs/srletters/2010/sr1016a1.pdf">http://www.federalreserve.gov/boarddocs/srletters/2010/sr1016a1.pdf</a>).</p>	<ol style="list-style-type: none"> <li>1. As Is</li> <li>2. As Stabilized</li> <li>3. As Completed</li> </ol>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
15	Internal Rating  ( <i>InternalRating</i> )	G080	<p>Report the bank's internal obligor rating that addresses the probability of default of the loan.</p> <p>Must be a list of values where each value pair is the bank's internal risk rating code followed by the percentage of total exposure that is rated with that risk rating. The format of these pairs will be the rating code followed by a colon followed by the fractional amount of the dollar value of the exposure that has that rating code. Each pair of rating code fractional amount would be separated by a semicolon and there should be as many codes as there are different split ratings in the credit.</p>	<p>The general form looks like this:</p> <p>Rating-code-1:% as decimal; Rating-code-2:% as decimal;...]</p> <p>For example, suppose the bank has ratings AAA, AA, A, BBB, BB, B, C, D. Suppose the credit is entirely rated AAA. The bank would supply this value:</p> <p>AAA:1</p> <p>Suppose a different case where half the credit's dollar value has a rating A and the other has C. The bank would supply:</p> <p>A:0.5;C:0.5</p> <p>All the decimal amounts must sum to 1.</p> <p>Internal Rating must be consistent with Schedule H.4 (Internal Risk Rating Schedule), Field 1.</p>	Mandatory
16	Probability of Default  ( <i>PD</i> )	G082	<p>For firms that are subject to the advanced approaches for regulatory capital, report the advanced IRB parameter estimate for the probability of default (PD) as defined in the Rule.</p> <p>For a defaulted obligor, report 100 percent ('1').</p> <p>For firms that are not subject to the advanced approaches for regulatory capital, report the PD estimate that corresponds to the Internal Rating. If the reporting entity does not assign a PD estimate to</p>	<p>Express as a decimal to 4 decimal places, e.g., 50% is 0.5000. Use decimal format; do not use scientific notation.</p> <p>If the reporting entity does not assign a credit facility PD estimate, report 'NA'.</p>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			the Internal Rating, report 'NA'.		
17	Loss Given Default ( <i>LGD</i> )	G086	<p>For firms that are subject to the advanced approaches for regulatory capital, report the advanced IRB LGD estimate at the loan level as defined in the Rule. If the credit facility includes multiple loans with different LGD assignments, report the dollar weighted average LGD that approximates the overall LGD on the committed balance of the credit facility.</p> <p>For firms that are not subject to the advanced approaches for regulatory capital, report the credit facility LGD estimate from the reporting entity's credit risk management system. If an LGD estimate is not assigned, report 'NA'.</p>	<p>Express as a decimal to 2 decimal places, e.g., 50% is 0.50. Use decimal format; do not use scientific notation.</p> <p>If the reporting entity does not assign a credit facility LGD estimate, report 'NA'.</p>	Mandatory
18	Exposure At Default ( <i>EAD</i> )	G083	<p>For firms that are subject to the advanced approaches for regulatory capital, report the advanced IRB parameter estimate for the Exposure at Default (EAD). If the credit facility includes multiple loans with different EAD assignments, report the dollar weighted average EAD that approximates the overall EAD on the committed balance of the credit facility.</p> <p>For firms that are not subject to the advanced approaches for regulatory capital, report the credit facility EAD estimate from the reporting entity's internal credit risk management system. If an EAD estimate is not assigned, report 'NA.'</p>	<p>Rounded whole dollar amount with no cents, e.g.: 20000000</p> <p>Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).</p> <p>If the reporting entity does not assign a credit facility EAD estimate, report 'NA'.</p>	Mandatory
19	Maturity Date ( <i>MaturityDate</i> )	9914	Report the maturity date. The maturity date is the last date upon which the funds must be repaid,	Must be in yyyy-mm-dd format, e.g.:	Mandatory



# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			<p>inclusive of extension options that are solely at the borrower's discretion, and according to the most recent terms of the credit agreement. If extension options are conditional on certain terms being met, such extensions should be considered to be at the sole discretion of the borrower. For demand loan, enter '9999-01-01'.</p> <p>For commitments to commit, report the estimated maturity date based on the tenor in the extended terms.</p>	<p>2005-02-01 1999-12-14</p>	
20	Amortization ( <i>Amortization</i> )	K457	<p>For loans with a monthly amortization schedule, report the original amortization term of the loan in months from the date given in Field 10 at the rate implied by the current payment disregarding any balloon payment.</p> <p>For Interest only loans enter '0' (zero).</p> <p>After the interest only period is over, report the number of months to fully amortize the loan.</p> <p>For a non-standard amortization schedule, report '-1'.</p> <p>Non-standard amortization would refer to a payment schedule that is not based on a preset amortization schedule of equal monthly payments. This would include payment schedules that have varying repayments based on the percentage of original or current balance, or repayments based upon certain trigger events.</p>	<p>Must be in whole months, e.g., 10 years would 120.</p> <p>For a non-standard amortization schedule, report '-1.'</p>	Mandatory

# DRAFT

Field No.	Field Name; (Technical Field Name)	MDRM (CRED)	Description	Allowable Values	Mandatory/Optional
21	Recourse ( <i>Recourse</i> )	G106	Indicate whether credit facility provides for has full, partial or no recourse to a sponsor or guarantor as a source of repayment, as of the reporting date.	<ol style="list-style-type: none"> <li>1. DO NOT USE</li> <li>2. DO NOT USE</li> <li>3. Full</li> <li>4. Partial</li> <li>5. None</li> </ol>	Mandatory
22	Line of Business ( <i>LineOfBusiness</i> )	K458	Indicate the internal line of business.	<p>Free text describing the line of business. For example: Retail, Private Banking, Corporate Banking, etc.</p> <p>Must be consistent with line of business names as reported in Schedule H.3 (Line of Business Schedule), Field 1.</p>	Optional
23	Current Occupancy ( <i>CurrentOccupancy</i> )	K459	<p>Report the current physical occupancy of rent-paying tenants (including tenants still in concessionary periods) as a % of net rentable square footage.</p> <p>Use NA if 1-4 family Residential Construction (FR Y-9C, Schedule HC-C, item 1.a(1)) or other construction and land development loans (FR Y-9C, Schedule HC-C, item 1.a(2)) does not have a currently valid certificate of occupancy.</p> <p>For loans originated for the purpose of condo construction where construction is completed but not all of the units have been sold (i.e., they are currently being leased and/or they are for sale), report the physical occupancy rate based on the</p>	<p>Provide as a fraction (2 decimal places), e.g.: "0.80" for 80%.</p> <p>Guidelines for populating:</p> <ul style="list-style-type: none"> <li>• '0' (zero) is to be used if the occupancy is actually zero.</li> <li>• NA is to be used for facilities where the data element is not applicable or the property does not have a currently valid certificate of occupancy - i.e. 1-4 family residential construction or other construction and land</li> </ul>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			<p>number of units owned by the borrower.</p> <p>"Current occupancy" means as close to the reporting date as possible (e.g. the occupancy level last determined by the borrower).</p>	<p>development loans.</p> <ul style="list-style-type: none"> <li>Numeric values are to be used for facilities where the occupancy is applicable and available.</li> </ul>	
24	Anchor Tenant ( <i>AnchorTenant</i> )	K460	<p>Report the name of anchor tenant (s), if applicable. Anchor tenant is defined as any tenant named in a co- tenancy clause or whose rental income accounts for the majority of the gross rental income at the property level.</p>	<p>Must not contain a vertical bar ( , ASCII 7C), carriage return, line feed, comma or any unprintable character.</p> <p>If there are multiple Anchor tenants, separate names with a double semi- colon ';;'.</p>	Optional
25	Loan Purpose ( <i>LoanPurpose</i> )	G073	<p>Indicate the purpose of the CRE Loan at the origination date, as recorded in Field 10, using an integer from the following list.</p> <p>The following Loan Purpose descriptions provide guidance based on commonly-used definitions. Report fields as defined in the BHC's or IHC's or SLHC's loan system.</p> <p>(1) Construction Build to Suit: The loan proceeds fund the construction of a building specified by a tenant and leased to the tenant / Construction Credit Tenant Lease: 100% occupancy to an investment grade tenant on a long term triple-net lease; both occupancy and lease type conditions must be met to meet this definition.</p> <p>(2) Land Acquisition &amp; Development: The loan proceeds fund the acquisition of vacant land or</p>	<ol style="list-style-type: none"> <li>1. Construction Build to Suit / Credit Tenant Lease</li> <li>2. Land Acquisition &amp; Development</li> <li>3. Construction Other</li> <li>4. DO NOT USE.</li> <li>5. DO NOT USE.</li> <li>6. Acquisition (nonowner occupied)</li> <li>7. Refinance</li> <li>8. Other</li> <li>9. Mini-Perm</li> </ol>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			<p>improvement of unimproved real property prior to the construction of building structures. The improvement of unimproved real property may include the laying or placement of sewers, water pipes, utility cables, streets, changes in zoning, and other infrastructure necessary for future development.</p> <p>(3) Construction Other: The loan proceeds fund the construction of buildings or other structures, including additions or alterations to existing structures and the demolition of existing structures to make way for new structures.</p> <p>(6) Acquisition (nonowner occupied): The loan proceeds fund the purchase or a change in the majority of ownership of non-owner occupied nonfarm nonresidential property or multifamily property.</p> <p>(7) Refinance: Replacement of an existing loan with a loan under different terms (e.g., new maturity, interest rate, etc.). These transactions generally do not involve the purchases or funding of structural changes to commercial real estate property. These would generally also exclude transactions involving a change in the majority ownership of the property.</p> <p>(8) Other: Loans which do not fall under one of the other loan purpose categories.</p> <p>(9) Mini-Perm: A form of short term financing for completed construction projects. Pursuant to Y-9C,</p>		

# DRAFT

Field No.	Field Name; (Technical Field Name)	MDRM (CRED)	Description	Allowable Values	Mandatory/Optional
			Schedule HC-C, domestic loans written as combination construction-permanent loans secured by real estate should be reported in Field 4 under options 1 or 2 until construction is completed and a certificate of occupancy is obtained or principal amortization payments begin, whichever comes first. BHCs, IHCs and SLHCs should indicate Option 9 once the loan is reported under options 3, 5 or 7 in Field 4 (Line Reported on FR Y-9C).		
26	Interest Rate Variability <i>(InterestRateVariability)</i>	K461	<p>Indicate the variability of current interest rates (Fixed, Floating, or Mixed) to maturity.</p> <p><del>For fully undrawn commitments, enter 0 (zero).</del></p> <p>For fully undrawn commitments, report interest rate variability that would apply per the terms of the credit agreement if the credit facility was fully drawn on the reporting date. If such fully undrawn credit facility allows for either fixed or floating draws at the borrower's discretion, then report '3' Mixed.</p> <p><u>For facilities where revenue is entirely fee based and no interest is or will ever be collected, enter '4' (Entirely fee based).</u></p>	<p>0. <del>Fully undrawn commitments DO NOT USE</del></p> <p>1. Fixed</p> <p>2. Floating</p> <p>3. Mixed</p> <p>4. <u>Entirely fee based</u></p>	Mandatory
27	Interest Rate <i>(InterestRate)</i>	7889	<p>Report the current interest rate charged on the CRE Loan. If the facility includes multiple draws with different interest rates, enter the dollar weighted average interest rate that approximates the overall rate on the drawn balance of the facility. Report interest rate exclusive of interest rate swaps.</p> <p>For fully undrawn commitments, report the interest rate that would apply per the terms of the credit</p>	<p>Provide as a decimal, e.g.: 0.0575 for 5.75%. <del>For fully undrawn commitments, enter '0' (zero).</del></p> <p><u>Enter 'NA' if the facility is entirely fee based.</u></p>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/Optional
			<p>agreement if the credit facility was fully drawn on the reporting date.</p> <p>For credit facilities that allow for multiple interest rates, when determining which rate to report, report the rate that was most conservative (highest) as of the most recent origination or renewal date. If the facility has been acquired more recently than the most recent origination or renewal date, report the rate that was most conservative as of the date of acquisition.</p> <p><a href="#">For entirely fee based facilities (as designated in Field 26), report 'NA'.</a></p>		
28	Interest Rate Index  ( <i>InterestRateIndex</i> )	K462	<p>For floating rate CRE Loans, report the list base interest rate using integer code. If borrower has an option, select the index actually in use.</p> <p>If the CRE loan is fixed <a href="#">or entirely fee based</a> (as designated in Field 26) choose the integer for “Not applicable (Fixed <a href="#">or entirely fee based</a>)”. For loan commitments where the base interest rate is mixed, choose the integer for “Mixed.”</p> <p><del>For fully undrawn commitments, enter 0 (zero).</del></p> <p>For fully undrawn commitments, report the interest rate index that would apply if the credit facility was fully drawn on the reporting date. If such fully undrawn credit facility allows for multiple indices at the borrower’s discretion, then report the interest</p>	<p>0. <del>Fully undrawn commitments DO NOT USE</del></p> <ol style="list-style-type: none"> <li>1. LIBOR</li> <li>2. PRIME or Base</li> <li>3. Treasury Index</li> <li>4. Other</li> <li>5. Not applicable (Fixed <a href="#">or entirely fee based</a>)</li> <li>6. Mixed</li> <li>7. SOFR</li> </ol>	Mandatory

# DRAFT

Field No.	Field Name; (Technical Field Name)	MDRM (CRED)	Description	Allowable Values	Mandatory/Optional
			rate index used to calculate Field 27 (Interest Rate).		
29	Interest Rate Spread <i>(InterestRateSpread)</i>	K463	<p>For floating rate CRE Loans, report the spread from base rate in basis points (this can be either positive or negative).</p> <p>If the CRE loan is fixed <u>or entirely fee based</u> (as designated in Field 26) populate 'NA'.</p> <p>If the CRE loan includes multiple draws with different spreads, provide the spread that approximates the overall spread on the loan.</p> <p><i>For fully undrawn commitments, report the interest rate spread that would apply per the terms of the credit agreement if the credit facility was fully drawn on the reporting date.</i></p>	<p>Provide as a decimal, e.g.: 0.0575 for 5.75%</p> <p>Enter 'NA' if the loan is fixed <u>or entirely fee based</u>.</p> <p>Negative numbers can be submitted. For negative values use a negative sign '-' not parenthesis ().</p> <p><i>For fully undrawn commitments, enter '0' (zero).</i></p>	Mandatory
30	Interest Rate Ceiling <i>(InterestRateCeiling)</i>	K464	<p>For floating rate CRE Loans, report the rate ceiling if one is contained in the credit agreement.</p> <p>If there is no ceiling, populate with 'NONE'.</p> <p>If the CRE loan is fixed <u>or entirely fee based</u> (as designated in Field26) populate 'NA'.</p> <p>For loan commitments with multiple interest rate ceilings, provide the maximum interest rate ceiling.</p> <p><i>For fully undrawn commitments, report the interest rate ceiling that would apply per the terms of the credit agreement if the credit facility was fully drawn</i></p>	<p>Provide as a decimal, e.g.: 0.0575 for 5.75%</p> <p>Enter 'NA' if the loan is fixed <u>or entirely fee based</u></p> <p>Enter 'NONE' if no ceiling.</p> <p><i>For fully undrawn commitments, enter '0' (zero).</i></p>	Mandatory

# DRAFT

Field No.	Field Name; (Technical Field Name)	MDRM (CRED)	Description	Allowable Values	Mandatory/Optional
			on the reporting date.		
31	Interest Rate Floor <i>(InterestRateFloor)</i>	K465	<p>For floating rate CRE Loans, report the rate floor if one is contained in the credit agreement. If there is no floor, populate with 'NONE'.</p> <p>If the CRE loan is fixed <u>or entirely fee based</u> (as designated in Field 26) populate 'NA'.</p> <p>For loan commitments with multiple interest rate floors, provide the minimum interest rate floor.</p> <p><i>For fully undrawn commitments, report the interest rate floor that would apply per the terms of the credit agreement if the credit facility was fully drawn on the reporting date.</i></p>	<p>Provide as a decimal, e.g.: 0.0575 for 5.75%</p> <p>Enter 'NA' if the loan is fixed <u>or entirely fee based</u></p> <p>Enter 'NONE' if no floor.</p> <p><del>For fully undrawn commitments, enter '0' (zero).</del></p>	Mandatory
32	Frequency of Rate Reset <i>(FrequencyofRateReset)</i>	K466	<p>For floating rate CRE Loans, report the frequency of interest rate reset in months. For frequencies less than (1) month, report as (1) month.</p> <p>the CRE loan is fixed or entirely fee based (as designated in Field 26) populate 'NA'.</p> <p><i>For fully undrawn commitments, report the frequency of the interest rate reset that would apply per the terms of the credit agreement if the credit facility was fully drawn on the reporting date.</i></p>	<p>Provide in whole months.</p> <p>Enter 'NA' if the loan is fixed <u>or entirely fee based</u>.</p> <p><del>For fully undrawn commitments, enter '0' (zero).</del></p>	Mandatory
33	Interest Reserves <i>(InterestReserv)</i>	K467	Report the dollar amount of remaining Interest rate reserves. Interest reserves would represent only those funds remaining from the original construction commitment to be used to pay interest	Rounded to whole dollar amount with no cents, punctuation or dollar signs.	Mandatory



# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
	es)		<p>during the construction and lease-up phases. If a participation, prorate based on your share of the credit.</p> <p>If interest reserves are not applicable, populate '0' (zero).</p>	<p>Guidelines for populating:</p> <ul style="list-style-type: none"> <li>'0' (zero) is to be used for facilities where an interest reserve is not part of the transaction (e.g. non-construction loans) or where the interest reserve is not funded.</li> <li>Numeric values are to be used for facilities where the interest reserve is applicable and available.</li> </ul>	
34	Origination Amount  ( <i>OriginationAmount</i> )	K468	Report the bank's total commitment as of the origination date given in Field 10. The total commitment is the dollar amount the obligor is contractually allowed to borrow according to the credit agreement as of the origination date. This includes both drawn and undrawn amounts. For facilities with multiple lenders, only provide the reporting entity's pro-rata commitment.	<p>Round to the whole dollar.</p> <p>Do not include punctuation or dollar sign.</p>	Mandatory
35	Original/Previous Loan Number  ( <i>OrigLoanNumber</i> )	G064	<p>Report the Internal identification code assigned to the credit facility record in the previous submission. If the credit facility represents the fulfillment of a commitment to commit reported in the previous submission, report the credit facility ID used for that formerly reported exposure. If there is no change from the prior submission, or if this is the first submission, then the Loan Number reported in Field 1 should be used as the Original/Previous Loan Number.</p> <p>For disposed credit facilities, where the reason for</p>	<p>May not contain a carriage return, line feed, -or any unprintable character.</p> <p>Provide the ID separated by a , (comma). For example, if facilities 123 and XYZ are aggregated into facility ABC then the "Unique ID" (H.1 Internal Credit Facility ID Field 15, H.2 Loan Number Field 1) is reported as ABC and the "Original ID" (H.1 Original Internal</p>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			the disposal is rebookings/restructures where loan amounts are transferred or combined between obligations, report the ID separated by a , (comma).	Credit Facility ID Field 16, H.2 Original/Previous Loan Number Field 35) is reported as 123, XYZ.	
36	Acquired Loan ( <i>AcqLoan</i> )	K469	<p>Indicate if the loan was acquired via a bank, portfolio or individual loan purchase (i.e. loan commitment that was acquired outside of the original underwriting syndication. This includes loans acquired in the secondary market via an individual loan purchase, loans acquired as part of the acquisition of an entire bank, or loans acquired as part of the acquisition of a portfolio of loans).</p> <p>Loans originated and underwritten by the reporting bank are reported as "2" (No).</p> <p>Once a loan has been renewed or modified, it should no longer be reported as an acquired loan. For purposes of this Field, a renewal or modification occurs when the acquiring bank has underwritten the loan (according to the credit policy of the bank).</p>	<p>1. Yes</p> <p>2. No</p>	Mandatory
37	# Days Principal or Interest Past Due ( <i>PastDue</i> )	G077	Report the longest number of days principal and/or interest payments are past due, if such payments are past due 30 days or more. Report the number of days past due as of the last day of the reporting period or disposition date. If payments are not past due 30 days or more, enter '0' (zero).	<p>Numbers only.</p> <p>For fully undrawn commitments, enter '0' (zero).</p>	Mandatory
38	Non-Accrual Date	G078	Report the date the credit facility was placed on	Must be in yyyy-mm-dd format, e.g.:	Mandatory

# DRAFT

Field No.	Field Name; (Technical Field Name)	MDRM (CRED)	Description	Allowable Values	Mandatory/Optional
	(NonAccrualDate)		<p>non- accrual, if applicable.</p> <p>If there is no non-accrual date, enter '9999-12-31'.</p> <p>For fully undrawn commitments, enter '9999-12-31'.</p>	<p>2005-02-01</p> <p>1999-12-14</p>	
39	Property Size (PropertySize)	K471	<p>Report this field only in cases where the <del>facility loan</del> is secured by one property. If the single property securing the <del>facilities loans</del> consists of <del>one single property type</del>, report the size for the property type as <del>detailed in the list below.</del><del>follows:</del> <del>If the single property securing the facility consists of multiple property types where one property type predominates (as defined in Field 9), report the size of the predominate property type as follows:</del></p> <p>Retail: Square Feet*</p> <p>Industrial/Warehouse: Square Feet*</p> <p>Hotel/Hospitality/Gaming: Rooms</p> <p>Multi-family for rent: Units</p> <p>Homebuilders except condo: Lots</p> <p>Condo: Units</p> <p>Office: Square Feet*</p> <p>Land and Lot</p> <p>Development: Acreage</p> <p><del>If the facility is secured by a single property which is comprised of multiple property types and no single property type predominates, report 'Other'.</del></p> <p><del>If the single property securing the loan consists of Mixed/Other property types, report 'Other'.</del></p>	<p>Whole number (no commas or decimals).</p> <p><del>If the facility is secured by a single property which is comprised of multiple property types and no single property type predominates, report 'Other'.</del></p> <p><del>If the single property securing the loan consists of Mixed/Other property types, report 'Other'.</del></p> <p>If the loan is secured by multiple properties, report 'NA.'</p>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			<p><a href="#">If the facility is secured by a single property and the property type reported in Field 9 is 'Other', report 'Other'.</a></p> <p>If the loan is secured by multiple properties, report 'NA'.</p> <p>*Square footage should be reported as net rentable area, which is defined as the square footage for which rent can be charged, generally the gross area less all vertical penetrations such as elevator shafts and stairwells. For a property under construction at the time of reporting, the BHC or IHC or SLHC should report the planned finished square footage of the property.</p>		
40	Net Operating Income (NOI) Current  ( <i>CurrentNetOperatingInc</i> )	K472	Report the most recent annualized NOI (as defined in Field 12) as of the report date that serves as the primary source of repayment.	Refer to Field 12 for allowable values.	Mandatory
41	Last NOI Date  ( <i>LastNOIDate</i> )	K473	Report the date for the value provided in CurrentNetOperatingInc (Field 40).	<p>Must be in yyyy-mm-dd format, e.g: 2005-02-01 1999-12-14</p> <p>Must be before or equal to the report date.</p> <p>This date may be Null (i.e. blank) if the Net Operating Income (NOI) Current (Field 40) is 'NA'.</p>	Mandatory

# DRAFT

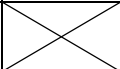

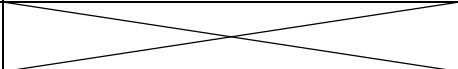
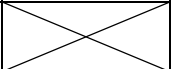
Field No.	Field Name; (Technical Field Name)	MDRM (CRED)	Description	Allowable Values	Mandatory/Optional
42	Current Value (CurrentValue)	M209	<p>Report the most recent value of the subject property, which may be either from an appraisal or an independent evaluation depending on legal (12 CFR 34) and bank policy requirements. If the most recent valuation is the value reported in field 13, then report the amount reported in field 13.</p> <p>Value is prorated based on the bank's ownership interest in a facility. If a loan is secured by multiple properties, report the sum of all property values as adjusted for prorated participations. In cases of cross- collateralization, provide the sum of all property values as adjusted for prorated participations.</p>	<p>Rounded whole dollar amount with no cents, e.g.: 20000000</p> <p>Supply numeric values without any non-numeric formatting such as dollar signs, commas or decimals.</p>	Mandatory
43	Last Valuation Date (LastValuation Date)	K475	Report the date of the most recent valuation provided in Current Value (Field 42).	<p>Must be in yyyy-mm-dd format, e.g.: 2005-02-01 1999-12-14</p> <p>Must be before or equal to the report date.</p>	Mandatory
44	Cross Collateralized Loan Numbers (CrossCollateralizedLoans)	M290	<p>Report the LoanNumbers (Field 1) for all the loans which are cross- collateralized with loans reported in Field 1. This includes loans that have a committed balance less than \$1 million.</p> <p>One loan secured by multiple properties is not considered cross-collateralized for the purpose of this field. In this field, only report loans that share properties in the collateral pool.</p> <p>The provided loan numbers must have a corresponding entry in the CRE collection. Cross-</p>	<p>Provide the LoanNumber separated by a , (comma). For example, if loans 123 and XYZ are cross- collateralized then enter 123, XYZ.</p> <p>Leave blank if loan is not cross collateralized.</p>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			collateralized loans that are not CRE Loans should be excluded.		
45	Additional Collateral  ( <i>AdditionalCollateral</i> )	M291	Report the value of any cash and marketable securities that are pledged as collateral and where the bank has a first perfected security interest.	Rounded whole dollar amount with no cents, e.g.: 20000000  Supply numeric values without any non-numeric formatting such as dollar signs, commas or decimals.	Optional
46	ASC 310-10 <sup>35</sup> ( <i>ASC31010</i> )	M292	Report the reserve applied to the loan per ASC 310-10 (formerly FAS 114, Accounting by Creditors for impairment of a loan). ASC 310-10 addresses specific reserves for impaired loans.  If ASU 2016-13 has been adopted, report 0 for ASC 310-10 and report any applicable allowance for credit losses in field 63 (ASC 326-20).	Rounded whole dollar amount with no cents, e.g.: 20000000  Supply numeric values without any non-numeric formatting such as dollar signs, commas or decimals.  Should be 0 if there is no ASC 310-10 Reserve for the loan.  For fully undrawn commitments, enter 0.	Mandatory

<sup>35</sup> Upon adoption of ASU 2016-13 by all FR Y-14 filing firms, this item will be eliminated.

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
47	ASC 310-30 <sup>36</sup> ( <i>ASC31030</i> )	M293	<p>Report the adjustment per ASC 310-30 (formerly Statement of Position (SOP) 03-3, Accounting for Certain Loans or Debt Securities Acquired in a Transfer) , that is not reflected in the allowance reported in Field 46.</p> <p>ASC 310-30 addresses the accounting for difference between contractual and expected cash flows for loans purchased with evidence of credit deterioration, which is defined in the accounting guidance as the nonaccretable difference..</p> <p>The amount referred to in this field is the remaining nonaccretable difference, less the amount of that difference that is reflected in Field 46.</p> <p>Provide if available at a credit facility level, otherwise a pro-rated allocation from the portfolio level to the loan level may be reported.</p> <p>If ASU 2016-13 has been adopted, report 0 for ASC 310-30 and report any applicable purchased credit deteriorated noncredit discount (or premium) in field 64 (Purchased Credit Deterioration Noncredit Discount).</p>	<p>Rounded whole dollar amount with no cents, e.g.: 20000000</p> <p>Supply numeric values without any non-numeric formatting such as dollar signs, commas or decimals.</p> <p>Should be 0 if there is no ASC 310-30 Reserve for the loan.</p> <p>For fully undrawn commitments, enter 0.</p>	47
48	DO NOT USE				

<sup>36</sup> Upon adoption of ASU 2016-30 by all FR Y-14 filing firms, this item will be eliminated.

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
49	Troubled Debt Restructuring  ( <i>TroubledDebt Restructuring</i> )		Indicate whether the loan has been restructured in a troubled debt restructuring as defined in the FR Y-9C Glossary entry for “troubled debt restructuring.”	1. No 2. Yes	Mandatory
50	DO NOT USE				
51	DO NOT USE				
52	Lower of Cost or Market Flag  ( <i>LOCOM</i> )		Indicate whether the loan is accounted for under the fair value option or is held for sale and carried at the lower-of-cost-or-market (LOCOM). For loans not accounted for under the fair value option or not held for sale, report Option 3 (NA).	1. LOCOM 2. FVO 3. NA	Mandatory
53	SNC Internal Credit ID  ( <i>SNCInternalC reditID</i> )		<p>If the credit facility is reported in the Shared National Credit collection and the reporting BHC or IHC or SLHC is the lead bank/agent (option 5 in Field 7), indicate the reporting BHC’s or IHC’s or SLHC’s Internal Credit ID as reported in the Shared National Credit collection for this credit facility as of the most recent filing date.</p> <p>If the credit facility is not reported in the Shared National Credit collection or the reporting BHC or IHC or SLHC is a participant in the Shared National Credit credit facility, report ‘NA’.</p>	<p>May not contain a carriage return, line feed, comma or any unprintable character.</p> <p>Report ‘NA’ if the credit facility is not reported in the Shared National Credit collection or if the reporting BHC or IHC or SLHC is not the agent.</p>	Mandatory



# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
54	Renewal Date ( <i>RenewalDate</i> )		<p>If the credit facility has been renewed per the terms of the original loan agreement, re-priced, or has a change in the maturity date such that the Origination Date did not change, report the date on which the most recent renewal notification became effective. The Renewal Date is intended to capture maturity date extensions provided to the obligor by the BHC or IHC or SLHC and extension options at the sole discretion of the borrower. If a credit facility has been renewed as part of a major modification such that the contractual date of the original loan is changed, then such date would be reported in Field 10 (Origination Date) and the BHC or IHC or SLHC should report 9999-12-31 in this field. If the credit facility has not been renewed the BHC or IHC or SLHC should report 9999-12-31 in this field.</p>	<p>Must be in yyyy- mm-dd format, e.g.: 2005-02-01 1999-12-14</p>	Mandatory
55	Credit Facility Currency  ( <i>CreditFacility Currency</i> )		<p>Indicate the currency denomination for contractual principal and interest payments on the credit facility, using the relevant three-letter ISO 4217 currency code.</p> <p>If payments are legally permitted or required in more than one currency, indicate the predominant currency for contractual credit facility payments.</p> <p>For the avoidance of doubt, whether or not the currency denomination of the credit facility is USD (US Dollars), all amounts reported in other fields of this schedule must be in terms of US Dollars.</p> <p>The predominant currency should be the currency which represents the predominant share of the</p>	<p>Standard ISO 4127 three-letter currency codes available at <a href="http://www.iso.org/iso/currency_codes">http://www.iso.org/iso/currency_codes</a></p>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			credit facility committed balance		
56	Current Occupancy Date  ( <i>CurrentOccupancyDate</i> )		Report the date on which the most recent occupancy level indicated in Field 23 (Current Occupancy) was determined by the borrower.	Must be in yyyy-mm-dd format, e.g.: 2005-02-01 1999-12-14  Must be before or equal to report date.  This date may be Null (i.e. blank) if the Current Occupancy (Field 23) is 'NA'.	Mandatory
57	Current Value Basis  ( <i>CurrentValueBasis</i> )		Provide integer code if the Current Value in Field 42 was calculated using an "as is," "as stabilized" or "as completed" value as defined in SR10-16  ( <a href="http://www.federalreserve.gov/boarddocs/srletters/2010/sr1016a1.pdf">http://www.federalreserve.gov/boarddocs/srletters/2010/sr1016a1.pdf</a> ).	1. As Is 2. As Stabilized 3. As Completed	Mandatory
58	Prepayment Penalty Flag  ( <i>PrepaymentPenaltyFlag</i> )		Indicate whether the credit facility has a prepayment penalty clause in effect which may include yield maintenance. Indicate option 1 (Yes) if the credit facility currently has a prepayment penalty clause in effect. If the facility had a prepayment penalty clause that has since expired, report option 2. If the facility does not have a prepayment penalty clause, report option 3.	1. Yes 2. The prepayment penalty has expired 3. No prepayment penalty clause	Mandatory

# DRAFT

Field No.	Field Name; (Technical Field Name)	MDRM (CRED)	Description	Allowable Values	Mandatory/Optional
59	Participation Interest (ParticipationInterest)		For participated or syndicated credit facilities, report the percentage of the total loan commitment held by the BHC or IHC or SLHC.  If the credit facility is not participated or syndicated, report 1.	Express as a decimal to 4 decimal places, e.g., 0.05% is 0.0005. Use decimal format; do not use scientific notation.	Mandatory
60	Leveraged Loan Flag (LeveragedLoanFlag)		Indicate '2' (Yes) if the credit facility is defined as a leveraged loan per criteria in the reporting entity's internal risk management framework developed pursuant to SR 13-3 (Interagency Guidance on Leveraged Lending).	<ol style="list-style-type: none"> <li>1. No</li> <li>2. Yes</li> </ol>	Mandatory
61	Disposition Flag (DispositionFlag)		Report the disposition method for any credit facility that was disposed during the reporting period.  If the BHC or IHC or SLHC is still pursuing payment of principal, interest of fees, report as option 0. Rebookings/restructures where loan amounts are transferred or combined between obligations should be reported as either option 1 (Payoff) or option 2 (Involuntary payoff) depending on the occurrence of default.  <ol style="list-style-type: none"> <li>0. Active – Report for all credit facilities required to be reported in this data collection and do not meet the definitions of options 1 through 7 as of the reporting date.</li> <li>1. Payoff – Report all instances where the credit facility has been paid in full by the borrower, or where an undrawn credit facility reaches</li> </ol>	<ol style="list-style-type: none"> <li>0. Active</li> <li>1. Payoff</li> <li>2. Involuntary payoff</li> <li>3. Involuntary Liquidation</li> <li>4. Sold or fully participated</li> <li>5. Below reporting threshold</li> <li>6. Transfer to another Y-14 schedule</li> <li>7. Expired Commitment to Commit</li> </ol>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
			<p>maturity and is not renewed.</p> <ol style="list-style-type: none"> <li>2. Involuntary Payoff – Report all instances where the credit facility has been paid in full after the occurrence of default per the terms of the credit agreement.</li> <li>3. Involuntary Liquidation – Report all instances where the credit facility has been liquidated either through foreclosure proceedings or another settlement option resulting in incomplete repayment of principal. Include short-sales, charge-offs, as well as REO. This includes loans active in the period prior to the reporting period that were sold at a foreclosure sale and taken into REO in the reporting period. Also include all instances where credit has been resolved (i.e. no longer pursuing collection) but not through foreclosures, servicing transfers, or payments made by the obligor.</li> <li>4. Sold or fully participated – Report all instances where the loan has been sold or participated to another institution during the reporting period.</li> <li>5. Below reporting threshold- Report all instances where the credit facility fell below the \$1 million reporting threshold.</li> <li>6. Transfer to another Y-14 schedule – Report all instances where the credit facility shifted to another Y-14 schedule. Indicate the schedule where the credit facility is now reported in field 62 below.</li> <li>7. Expired Commitment to Commit</li> </ol>		

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
62	Disposition Schedule Shift  ( <i>Disposition ScheduleShift</i> )		<p>For credit facilities reported with option 6 (Transfer to another Y-14 schedule) in field 61, indicate the Y-14 report, schedule, and sub-schedule to which the credit facility shifted.</p> <p>The reported format should follow these examples:</p> <p>If the credit facility transferred to FR Y-14Q Schedule H.2 Corporate Loans, report "Q.H.1"</p> <p>If the credit facility transferred to FR Y-14M Schedule A.1 Domestic First Lien Closed-end 1-4 Family Residential Loan Data Dictionary, report "M.A.1".</p>	<p>Report in the format using the examples below:</p> <p>If the credit facility transferred to FR Y-14Q Schedule H.2 Corporate Loans, report "Q.H.1".</p> <p>If the credit facility transferred to FR Y-14M Schedule A.1 Domestic First Lien Closed-end 1-4 Family Residential Loan Data Dictionary, report "M.A.1".</p>	Mandatory
63	ASC326-20 <sup>37</sup> ( <i>ASC32620</i> )		<p>Report the allowance for credit losses per ASC 326-20.</p> <p>Provide at the credit facility level if available otherwise report a pro-rated allocation from the collective (pool).</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting such as no dollar signs, commas or decimals.</p> <p>Should be 0 if there is no ASC326-20 Reserve for the loan.</p>	Mandatory
64	Purchased Credit Deteriorated Noncredit		<p>If the facility is a purchased credit-deteriorated (PCD) asset, report the noncredit discount (or premium) resulting from its acquisition (ASC 326-20-30-13). Provide at the credit facility level if available,</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting such as</p>	Mandatory

<sup>37</sup> Only institutions that have adopted ASU 2016-13 should report items 63 and 64.

# DRAFT

Field No.	Field Name; (Technical Field Name)	MDRM (CRED)	Description	Allowable Values	Mandatory/Optional
	Discount <i>(PCDNoncredit Discount)</i>		otherwise report a pro-rated allocation from the collective (pool) basis.  Leave Blank if the facility is not considered a PCD asset.	no dollar signs, commas or decimals.	
65	Current Maturity Date <i>(CurrentMaturityDate)</i>		Report the maturity date as the last date upon which the funds must be repaid, exclusive of extension options.  For demand loan, enter '9999-01-01'. For commitments to commit, report the estimated maturity date based on the tenor in the terms extended to the borrower.	Must be in yyyy-mm-dd format, e.g.: 2005-02-01 1999-12-14	Mandatory
66	Committed Exposure Global Par Value		For held for sale loans and loans accounted for under a fair value option, report the total commitment amount as the amount the obligor is contractually allowed to borrow according to the credit agreement for the entire credit facility.  If not held for sale or accounted for under a fair value option, report 'NA'.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).  For negative values use a negative sign '-', not parentheses ().  If not held for sale or accounted for under a fair value option, report 'NA'.	Mandatory
67	Outstanding Balance Par Value		For held for sale loans and loans accounted for under a fair value option, report the outstanding funded exposure.  If not held for sale or accounted for under a fair value option, report 'NA'.	Rounded whole dollar amount, e.g.: 20000000  Supply numeric values without any non-numeric formatting (no dollar sign, commas or decimal).	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
				<p>For negative values use a negative sign '-', not parentheses ().</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>	
68	Committed Exposure Global Fair Value		<p>For held for sale loans and loans accounted for under a fair value option, report the fair value of the entire credit facility.</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).</p> <p>For negative values use a negative sign '-', not parentheses ().</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>	Mandatory
69	Outstanding Balance Fair Value		<p>For held for sale loans and loans accounted for under a fair value option, report the fair value of the outstanding funded exposure.</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>	<p>Rounded whole dollar amount, e.g.: 20000000</p> <p>Supply numeric values without any non- numeric formatting (no dollar sign, commas or decimal).</p> <p>For negative values use a negative sign '-', not parentheses ().</p> <p>If not held for sale or accounted for under a fair value option, report 'NA'.</p>	Mandatory

# DRAFT

Field No.	Field Name; ( <i>Technical Field Name</i> )	MDRM (CRED)	Description	Allowable Values	Mandatory/ Optional
70	Obligor LEI (ObligorLEI)		Report the Legal Entity Identifier (LEI) of the obligor identified in field 2, if available. A LEI is a 20 character alphanumeric code that uniquely identifies legally distinct entities that engage in financial transactions. LEIs are issued by Local Operating Units (LOUs) of the Global LEI System. If LEI does not apply, enter 'NA'.	Must be a valid 20 character alphanumeric LEI issued by a LOU of the Global LEI System, or 'NA'.	Mandatory

### **H.3 – Line of Business Schedule**

The Line of Business schedule collects the universe of lines of business as reported on schedule H.1 and H.2 along with a free text description.

#### **A. Data Format**

Data should be provided in a single extensible markup language file (.xml). No quotation marks should be used as text identifiers. Do not provide a header row or a row count. This file will contain one record per line of business.



# DRAFT

## B. Line of Business Data Fields

The table on the following pages shows the fields that should be contained in the submission file. Report all fields with data as of the report date.

Field No.	Field Name; ( <i>Technical Field Name</i> )	Description	Allowable Values
1	Line of Business  ( <i>LineOfBusinessName</i> )	Provide the name of the internal line of business.	Free text indicating the internal line of business. For example: Private Banking, Corporate Banking, Asset- Based Lending, etc.  Collectively, Line of Business defines the set of allowable values for Field 27 on Schedule H.1 and Field 22 on Schedule H.2.
2	Line of Business Description  ( <i>LineOfBusinessDescription</i> )	Provide a brief description of the internal line of business.	Free text describing the internal line of business.

## H.4 – Internal Risk Rating Schedule

The Internal Risk Rating schedule collects the universe of internal risk ratings as reported on schedule H.1 and H.2 along with a free text description.

### A. Data Format

Data should be provided in a single extensible markup language file (.xml). No quotation marks should be used as text identifiers. Do not provide a header row or a row count. This file will contain one record per internal risk rating.

### B. Internal Risk Rating Data Fields

# DRAFT

The table on the following pages shows the fields that should be contained in the submission file. Report all fields with data as of the report date.

Field No.	Field Name; ( <i>Technical Field Name</i> )	Description	Allowable Values
1	Internal Risk Rating ( <i>InternalRating</i> )	Report each rating grade used in the reporting entity's internal risk rating system.	Free text indicating the internal risk rating grade.  Collectively, Internal Risk Rating defines the set of allowable values for Field 10 "Obligor Internal Risk Rating" on Schedule H.1 and the portion of Field 15 "Internal Rating" associated with the internal risk rating code on Schedule H.2.
2	Internal Risk Rating Description ( <i>InternalRatingDescription</i> )	Provide a brief description of the internal risk rating.	Free text describing the internal risk rating.

**DRAFT**

# DRAFT

## Schedule J – Retail Fair Value Option/Held for Sale (FVO/HFS)

The Fair Value Option/Held for Sale (FVO/HFS) schedule collects information on retail loans and leases that are classified as either (1) Held for Sale (HFS) or (2) Held for Investment (HFI) under the Fair Value Option (FVO). The loan population is limited to retail loans and leases. For purposes of this schedule, retail loans and leases include credit card loans, first lien closed-end 1-4 family residential loans and leases, home equity loans and leases, student loans, auto loans and leases, and other consumer loans and leases (refer to the instructions for the respective FR Y-14Q/M schedules for definitions of these loan categories). Include SME and Corporate Card loans (defined in the FR Y-14Q, Balances Schedule). Do not include commercial real estate loans (defined in the FR Y-14Q, Commercial Real Estate Schedule), corporate loans (defined in the FR Y-14Q, Corporate Loans Schedule), small business loans (defined in the FR Y-14Q US Small Business Schedule), loans secured by farmland (defined in the FR Y-9C, Schedule HC-C, item 1.b), or loans to finance agricultural production and other loans to farmers (defined in the FR Y-9C, Schedule HC-C, item 3) on this schedule. Do not include loans serviced for others (i.e. serviced loans that are not directly held in the loan portfolio).

### **Table 1**

Table 1 has two columns. In column A report the unpaid principal balance of loans and leases as of the report date in millions. In column B report the carrying value of loans and leases as of the report date in millions. For purposes of this Schedule, “carrying value” is defined as follows:

For HFS loan, the carrying value is the lower of cost or fair value.

For HFS loans that the holding company has elected to report at fair value under the fair value option, the carrying value is fair value.

For HFI loans that the holding company has elected to report at fair value under the fair value option, the carrying value is fair value.

### **Item Instructions**

For each column in Table 1: (i) the sum of items 1 through 3 must equal item 4; (ii) the sum of items 5 through 9 must equal item 10; and (iii) the sum of items 4, 10, and 11 must equal item 12.

### **Line item 1 Residential Loans with Forward Contracts to Federal Agencies**

Report in the appropriate column the unpaid principal balance and the carrying value of all residential retail loans and leases with forward contracts to Federal Agencies.

For purposes of this schedule, residential retail loans include all loans meeting the definition of FR Y-9C, Schedule HC-C, items 1.c(1), 1.c(2)(a), and 1.c(2)(b). Residential retail leases include all leases reported in FR Y-9C, Schedule HC-C, item 10.b that otherwise meet the classification criteria to be considered a residential loan, except for the fact that they are a lease rather than a loan.

# DRAFT

For purposes of this schedule, loans and leases with forward contracts to Federal Agencies are loans and leases originated for the purpose of selling to Federal Agencies (i.e. Fannie Mae, Freddie Mac, Ginnie Mae, etc.) for future securitization.

**Line item 2 Residential Loans Repurchased from Agencies with FHA/VA Insurance**

Report in the appropriate column the unpaid principal balance and the carrying value of all residential retail loans and leases repurchased from agencies such as the Federal Housing Administration (FHA) or Veterans Administration (VA) insurance.

**Line item 3 All Other Residential Loans Not Included Above**

Report in the appropriate column the unpaid principal balance and the carrying value of all other residential retail loans and leases not included in items 2 or 3 above.

**Line item 4 Total Residential Loans**

Item 4 includes shaded cell and is derived from the sum of items 1, 2, and 3.

**Line item 5 Non-Residential Loans with Forward Contracts to Federal Agencies**

Report in the appropriate column the unpaid principal balance and the carrying value of loans and leases that do not meet the definition of residential loans or leases, reported in Line item 1, that were originated for the purpose of selling to Federal Agencies (i.e. Fannie Mae, Freddie Mac, Ginnie Mae, etc.) for future securitization.

**Line item 6 Student Loans (Not in Forward Contracts)**

Report in the appropriate column the unpaid principal balance and the carrying value of loans to finance educational expenses, as defined in the FR Y-9C, Schedule HC-C, item 6.d, that were not originated for the purpose of selling to Federal Agencies (i.e. Fannie Mae, Freddie Mac, Ginnie Mae, etc.) for future securitization.

**Line item 7 Credit Card Loans (Not in Forward Contracts)**

Report in the appropriate column the unpaid principal balance and the Carrying Value of all extensions of credit to individuals for household, family, and other personal expenditures arising from credit cards, as defined in the FR Y-9C, Schedule HC-C, item 6.a. Also include in this line item the unpaid principal balance and carry value of SME and Corporate Cards, as defined in the FR Y-14Q Schedule M (Balances). Exclude loans originated for the purpose of selling to Federal Agencies (i.e. Fannie Mae, Freddie Mac, Ginnie Mae, etc.) for future securitization.

**Line item 8 Auto Loans (Not in Forward Contracts)**

Report in the appropriate column the unpaid principal balance and the carrying value of all consumer loans and lease agreements extended for the purpose of purchasing new and used passenger cars and other vehicles such as minivans, vans, sport-utility vehicles, pickup trucks, and similar light trucks for personal use, as defined in the FR Y-9C, Schedule HC-C, item 6.c, that were not originated for the purpose of selling to Federal Agencies (i.e. Fannie Mae, Freddie Mac, Ginnie Mae, etc.) for future securitization. Include all relevant leases reported in FR Y-9C, Schedule HC-C, item 10.a that otherwise meet the classification criteria to be considered an auto loan, except for the fact that they are a lease rather than a loan.

**Line item 9 All Other Non-Residential Loans Not Included Above**

Report in the appropriate column the unpaid principal balance and the carrying value of all non-residential loans and lease agreements and extensions of credit to individuals for household, family, and other personal expenditures as defined in the FR Y-9C, Schedule HC-

# DRAFT

C, items 6(b) & 6(d), that are not reported in Items 1 through 8 above. Include all relevant leases reported in in FR Y-9C, Schedule HC-C, item 10 that otherwise meet the classification criteria to be considered other non-residential loans, except for the fact that they are a lease rather than a loan.

## **Line item 10 Total Non-Residential Loans**

Item 10 includes shaded cells and is derived from the sum of items 5 through 9.

## **Line item 11 Other Retail Loans with Zero Principal or Interest Recourse to the Bank**

Report in the appropriate column the unpaid principal balance and the carrying value of any retail loans and leases that present no recourse liability to the bank.

## **Line item 12 Total Retail FVO/HFS Loans**

Item 12 includes shaded cells and is derived from the sum of items 4, 10 and 11.

## **Table 2**

Table 2 has nine columns (A-I). The definitions of the loan categories in Columns A through H are defined in Table 1 above. Column I contains shaded cells, and items are derived from the sum of Columns A through H. Below is a list of Columns included on Table 2:

**Column A Residential Loans in Forward Contract**

**Column B Residential Loans (Repurchased with FHA/VA Insurance)**

**Column C All Other Residential Loans Not Included in Columns A or B**

**Column D Non-Residential Loans with Forward Contracts to Federal Agencies**

**Column E Student Loans (Not in Forward Contract)**

**Column F Credit Card Loans (Not in Forward Contract)**

**Column G Auto Loans (Not in Forward Contract)**

**Column H All Other Non-Residential Loans Not Included in Columns D, E, F or G**

**Column I Total**

Items in Column I are shaded cells and are derived from the sum of Columns A through H.

## **Item Instructions**

The rows in this table refer to the vintage of the loan or lease. The vintage of the loan is the calendar year that the loan or lease was originated. The vintages range from Pre 2006 to the current calendar year.

Categorize loans and leases by vintage and report the entire carrying value of the loan or lease in the row corresponding with the calendar year that the loan or lease was originated. Additionally, categorize loans and leases by the loan classifications provided in columns A through H. Report the total carrying value of loans and leases as of the report date in

# DRAFT

millions in the appropriate column and row according to loan classification (column) and vintage (row).

The Total row contains shaded cells, and items are derived from the sum of the vintage years. The amount reported in Table 2, Column I, Row 8 should equal the sum of in Table 1, Column B, Row 4 and Table 1, Column B, Row 10.

## Schedule K - Supplemental

The Supplemental Schedule is intended to capture gaps in the data collected between the FR Y-14 and the FR Y-9. Not all BHCs, IHCs and SLHCs will need to complete all cells in the schedule. Refer to the instructions below to determine which part of the schedule you must complete. See the definitions of the loans in each row of the schedule in Reference Table K.1 of these instructions.

Refer to the FR Y-14Q/M General Instructions for information on the as-of and filing dates for this schedule and the other FR Y-14Q and FR Y-14M schedules.

For the purposes of reporting this schedule, the carrying value of an asset is defined as the original cost of the asset less any write-downs associated with depreciation, amortization or impairment costs.

Technical instructions on how to submit the data for this schedule will be provided separately.

Provide all dollar unit data in millions of dollars (\$ Millions).

### Column A: Immaterial Portfolios

Report the carrying value of loans in immaterial or excluded portfolios that were not reported in the FR Y-14Q or FR Y-14M schedules because they were immaterial based on the FR Y-14 materiality thresholds. If the loans in a given row were reported in the FR Y-14Q or FR Y-14M, leave the row blank.

### Column B: Cumulative Gross Charge-offs

Only report categories of loans for which you reported FR Y-14Q or FR Y-14M Schedule A - Retail Worksheets. For each row in column B, report the cumulative lifetime gross charge-offs on loans reported in the FR Y-14Q or FR Y-14M schedules.

### Column C: Purchase Impairments and Fair Value Adjustments<sup>38</sup>

Only report categories of loans for which you reported FR Y-14Q or FR Y-14M Schedule A - Retail Worksheets. For each row in column C, report the cumulative lifetime purchase impairments and fair value adjustments on loans reported in the FR Y-14Q or FR Y-14M schedules.

### Column D: Outstanding Balance of Commercial Real Estate (CRE) and Corporate loans under \$1M in committed balance

Report the outstanding balance of CRE and corporate loans with under \$1M in committed balance for each of the categories which were excluded from the FR Y-14Q, Schedule H - Wholesale Risk, Worksheet 2, CRE and Worksheet 1, Corporate Loan based solely on

---

<sup>38</sup> Institutions that have adopted ASU 2016-13 are not required to report Column C. Column C will be eliminated upon full adoption.

# DRAFT

commitment size (i.e. report the outstanding balance for loans which otherwise would meet the definition of the loan population in those schedules). For CRE related rows, do not report loans less than \$1 million which are reported on the FR Y-14Q, Schedule H – Wholesale Risk, Worksheet 2, CRE schedule due to cross collateralization.

## **Column E: Unplanned Overdrafts**

Report any unplanned overdrafts as defined in the FR Y-9C HC-C, item 9 and which were excluded from the FR Y-14Q, Schedule H – Wholesale Risk, Worksheet 1, Corporate Loan.

## **Column F Scored loans**

Report the carrying value of any scored loans reported in the respective FR Y-9C line items.

For the purposes of this report, a loan is reported as a scored/delinquency managed loan if the primary focus of the underwriting decision is an individual. A loan is reported as a graded loan if the focus of the underwriting decision is the cash flows of the organization.



# DRAFT

**Reference Table K.1**

Category	Definition
1. Student Loans	Student loans in line 6.d of schedule HC-C of the FR Y-9C
2. Other Consumer	
2a. Domestic	Domestic other consumer loans reported on lines 6.b and 6.d of schedule HC-C of the FR Y-9C
2b. International	International other consumer loans reported on lines 6.b and 6.d of schedule HC-C of the FR Y-9C
3. First Lien	
3a. Domestic	Domestic first lien loans reported on line 1.c.(2).a of schedule HC-C of the FR Y-9C
3b. International	International first lien loans with an analogous definition to the definition of loans on line 1.c.(2).a of schedule HC-C of the FR Y-9C
4. Junior Lien	
4a. Domestic	Domestic junior lien loans reported on line 1.c.(2).b or 1.c.(1) of schedule HC-C of the FR Y-9C
4b. International	International junior lien loans with an analogous definition to the definition of loans on reported on line 1.c.(2).b or 1.c.(1) of schedule HC-C of the FR Y-9C
5. Bank and Charge Cards	
5a. Domestic	Domestic bank and charge cards reported on line 6.a of schedule HC-C of the FR Y-9C
5b. International	International bank and charge cards reported on line 6.a of schedule HC-C of the FR Y-9C
6. Auto	
6a. Domestic	Domestic auto loans on line 6.c of schedule HC-C of the FR Y-9C
6b. International	International auto loans on line 6.c of schedule HC-C of the FR Y-9C
7. Commercial Real Estate	
7a. Construction	
7a.(1) Domestic	Domestic C&D loans on lines 1.a.(1) or 1.a.(2) of schedule HC-C of the FR Y-9C
7a.(2) International	International C&D loans with an analogous definition to the definition of loans on lines 1.a.(1) or 1.a.(2) of schedule HC-C of the FR Y-9C
7b. Multifamily	
7b.(1) Domestic	Domestic Multifamily loans on line 1.d of schedule HC-C of the FR Y-9C
7b.(2) International	International Multifamily loans with an analogous definition to the definition of loans on line 1.d of schedule
7c. NFNR - Non-owner occupied	
7c.(1) Domestic	Domestic NFNR loans on line 1.e.(2) of schedule HC-C of the FR Y-9C
7c.(2) International	International NFNR loans with an analogous definition to the definition of loans on line 1.e.(2) of schedule HC-
7d. NFNR - Owner occupied	
7d.(1) Domestic	Domestic NFNR loans on line 1.e.(1) of schedule HC-C of the FR Y-9C
7d.(2) International	International NFNR loans with an analogous definition to the definition of loans on line 1.e.(1) of schedule HC-
8. Loans Secured by Farmland	
8a. Domestic	Domestic farmland loans on line 1.b of schedule HC-C of the FR Y-9C
8b. International	International farmland loans with an analogous definition to the definition of loans on line 1.b of schedule
9. Commercial and Industrial	
9a. Graded	Graded loans on line 4.a or 4.b of schedule HC-C of the FR Y-9C
9b. Small Business	
9b.(1) Domestic	US small business loans for which a commercial internal risk rating is not used or that uses a different scale than other corporate loans reported on lines 2.a, 2.b, 3, 4.a, 7, 9.a, 9.b.(1), 9.b.(2), 10.b of schedule HC-C of the FR Y-9C excluding corporate and SME credit card loans included on line 4.a of schedule HC-C of the FR Y-9C.
9b.(2) International	International small business loans for which a commercial internal risk rating is not used or that uses a different scale than other corporate loans reported on lines 2.a, 2.b, 3, 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 SME credit card loans included on line 4.a of schedule HC-C of the FR Y-9C.
10. Graded Other Loans	
10a. Graded Loans to Foreign Governments	Graded loans on line 7 of schedule HC-C of the FR Y-9C
10b. Graded Agricultural Loans	Graded loans on line 3 of schedule HC-C of the FR Y-9C
10c. Graded Loans to Depositories and Other Financial	Graded loans on lines 2.a., 2.b., and 9.a of schedule HC-C of the FR Y-9C
10d. Other Graded Commercial Leases	Graded leases on line 10.b of schedule HC-C of the FR Y-9C
10e. All Other Graded Loans	Graded loans on line 9.b.(2) of schedule HC-C of the FR Y-9C
Not loan category specific	Loans reported in the respective FR Y-9C line items

# DRAFT

## Schedule L - Counterparty

**Columns that collect information based on the supervisory stress scenarios and sub-schedules that require scenario-dependent ranking methodologies<sup>39</sup> are only required to be populated for the submission of data from the as-of quarter of CCAR.**

This schedule has 18 sub-schedules for information on counterparty credit risk grouped as follows:

L.1. Derivatives profile by counterparty and aggregate across all counterparties

1.a. Top consolidated/parent counterparties comprising 95% of firm unstressed Credit Valuation Adjustment (CVA), ranked by unstressed CVA

1.b. Top consolidated/parent counterparties comprising 95% of firm stressed CVA, ranked by Federal Reserve Severely Adverse Scenario stressed CVA for the CCAR quarter

1.e Aggregate CVA data by ratings and collateralization

e.1 Aggregate CVA data

e.2 Additional/Offline CVA reserves

e.3 Collateralized netting sets (netting sets with a CSA agreement in place), sorted by Internal Rating

e.4 Uncollateralized netting sets (netting sets without a CSA agreement in place), sorted by Internal Rating

1.f. Residual counterparty summary metrics by collateralization, industry, region, and ratings

f.1. Residual counterparties: collateralized netting sets (netting sets with a CSA agreement in place)

f.2. Residual counterparties: uncollateralized netting sets

L.2. Expected Exposure (EE) profile by counterparty

2.a. EE profile by counterparty: Top consolidated/parent counterparties comprising 95% of firm unstressed CVA, ranked by unstressed CVA

2.b. EE profile by counterparty: Top consolidated/parent counterparties comprising 95% of firm stressed CVA, ranked by Federal Reserve Severely Adverse Scenario Stressed CVA for the CCAR quarter

L.3. Credit quality by counterparty

3.a. Credit quality by counterparty: Top consolidated/parent counterparties comprising 95% of firm unstressed CVA, ranked by unstressed CVA

3.b. Credit quality by counterparty: Top consolidated/parent counterparties comprising 95% of firm stressed CVA, ranked by Federal Reserve Severely Adverse Scenario stressed CVA for the CCAR quarter

L.4. Aggregate and top CVA sensitivities by risk factor

4.a. Aggregate CVA sensitivities by risk factor

4.b. Top 10 consolidated counterparties CVA sensitivities by risk factor

L.5. Derivatives and securities financing transactions (SFT) profile: All CCPs and G7 sovereigns, and the IHC's affiliate counterparties + Top 25 non-CCP/non-G7/non-IHC's affiliates SFT and derivative counterparties

5.1 Derivative and SFT information by counterparty legal entity and netting set/agreement

5.2 SFT assets posted and received by counterparty legal entity and netting set/agreement and asset-category

5.3 Aggregate SFTs by Internal Rating

5.4 Derivative positions detail by counterparty legal entity and netting set/agreement and asset category

---

<sup>39</sup> This applies to sub-schedules L.1.b, L.1.f.1-2, L.2.b, L.3.b.

# DRAFT

Additionally, reporting institutions can provide supporting information to explain the content of specific items in this schedule. If the BHC or IHC or SLHC elects to provide additional data, this should include an explanation of the additional data and why it is provided. If the data links to data in other schedules of the CCR schedule, then a clear data identifier must be provided such that schedules may be merged if necessary (see counterparty identification details below).

## Data Formatting Instructions

Future time buckets (sub-schedule L.2 and L.3): The level of granularity of future revaluation time buckets should be at the level used to calculate CVA at the BHC or IHC or SLHC, and should be as granular as available.

For sub-schedules L.1.a, and L.1.b provide data at the counterparty legal entity level (unit of observation = counterparty legal entity). For sub-schedule L.2.a and L.2.b, provide all available data at the counterparty legal entity + tenor bucket level (unit of observation = counterparty legal entity + tenor bucket). For sub-schedule L.3.a and L.3.b, provide data at the counterparty legal entity level for each date of market data inputs used. For sub-schedule L.4, provide data at the consolidated/parent level. For sub-schedule L.5 provide data at the netting set/agreement level as well as at the aggregated level by rating.

~~Where applicable, fields that allow optional reporting should be populated with appropriate information or with "NA."~~ For all required fields, 1) where information is not available or applicable, fields should be left blank and 2) where firms do not have exposures, a zero should be reported. Incorrectly reported fields will be rejected.

For sub-schedules L.1-L.5, all figures reported should be reported in positive terms with the exception of single name credit hedges and position MtM on sub-schedules L.1.a-L.1.e, which can be reported as either positive or negative figures (net sold position reported as positive, net bought position reported as negative). **See sub-schedule L.5 for further formatting guidelines**, as several items can be reported in positive or negative terms.

## Counterparty Exposure Universe

### Sub-Schedules L.1 – L.4

All counterparty exposures related to derivatives activities should be included in the universe of transactions applicable for sub-schedules L.1- L.4. All counterparty exposures related to repurchase and reverse repurchase agreements, securities lending and securities borrowing activities ("SFT" hereafter) that are fair-valued should be included in the universe of transactions applicable for sub-schedule L.1.e.2 under category b.1. Non-fair valued SFTs should not be included in sub-schedules L.1-L.4.

For regular/unstressed submissions, counterparty exposures on sub-schedules L.1-L.4 should be limited to transactions for which the firm computes CVA for its public financial statement reporting under generally accepted accounting principles (GAAP) or applicable standard.

For CCAR/stressed submission, the scope of counterparty exposures on sub-schedules L.1-L.4 is expected to be larger and incorporate transactions that would not typically require CVA for public financial statement reporting under GAAP or applicable standard, for example, fully- or over- collateralized derivatives, but which may pose a gap risk to the firm, requiring CVA, should the post-stress value of collateral be insufficient to cover post-stress derivatives exposure.

### Sub-schedule L.5

All counterparty exposures related to derivatives, repurchase, and reverse repurchase agreements, securities lending and securities borrowing activities should be included in the universe of transactions

# DRAFT

applicable for sub-schedule L.5. In addition, a firm's exposures to its client should also be reported in sub-schedule L.5 when the firm has a direct or indirect credit exposure to a client on a derivative transaction. This includes either the case in which the firm is acting as a financial intermediary on behalf of the client and enters into an offsetting transaction with a CCP or an exchange (referred to as a back-to-back derivative) or the case in which the firm guarantees the client's performance to a CCP or an exchange (referred to as a guaranteed derivative). For SFTs, the firm should include exposures that arise in situations in which the firm is acting as a principal or on behalf of a client (agent) for which lender indemnification has been provided against the borrower's default. The counterparty to be reported is the consolidated organization that is a legal principal in the transaction (i.e. not the agent). Intraday SFT transactions and prime brokerage margin lending should be excluded in sub-schedule L.5.

## Sub-Schedule L.1 – L.5

In addition to the above, the U.S. Intermediate Holding Company (IHC) is also required to include any of its affiliate entities as a counterparty when reporting counterparty exposures in sub-schedules L.1-L.5. For details on required reporting of central counterparty exposures, please see the Central Counterparty Reporting section below.

## **Counterparty Identification**

All counterparties must have a unique counterparty identifier. In addition, the name of the counterparty should be provided. Unique identifiers and names must be consistent across sub-schedules. In particular, it must be possible to merge sub-schedules L.1, L.2, L.3, and L.5, Consolidated/Parent Counterparty ID, Counterparty Legal Entity Identifier (LEI), Netting Set ID, and Sub-Netting Set ID, if applicable. **Specifically for sub-schedules L.1, L.2, and L.3:** If any netting set or sub-netting set IDs are provided on one sub-schedule, they must be provided on all sub-schedules. **Specifically for sub-schedules L.5:** The Consolidated/Parent Counterparty Name and Consolidated/Parent Counterparty ID, Counterparty Legal Entity Identifier (LEI) and Netting Set ID must be consistent with those reported in sub-schedules L.1, L.2, and L.3, if applicable. Other identifying information – industry, country, internal rating, and external rating – must be reported at the counterparty legal-entity level, i.e. for each reported counterparty legal entity immediately facing the firm.

## **Consolidation of Counterparties**

Sub-schedules L.1-L.3: For all counterparties, exposures should be reported at the legal entity level. However, for ranking purposes in determining top 95% unstressed CVA or top 95% stressed CVA, top counterparties should be identified based on the exposure amount at a consolidated counterparty level. The relevant consolidated/parent counterparty information should be reported in Consolidated/Parent Counterparty Name and Consolidated/Parent Counterparty ID data fields.

Do not consolidate bankruptcy-remote entities.

Report the industry code, country, and internal/external rating of each reported counterparty legal entity.

Sub-schedule L.4: The top 10 counterparties sensitivities by risk factors should be ranked at the consolidated/parent level, and should also be reported at the consolidated/parent level.

Sub-schedule L.5: Any consolidation requirements for this sub-schedule is located below in the specific instructions for this sub-schedule.

# DRAFT

## Central Counterparty Reporting

Central clearing counterparty (CCP) exposures should include both cleared OTC derivatives and exchange traded derivatives. For counterparties that clear both OTC derivatives and exchange traded derivatives (namely futures and options), provide a breakout of the amount of exposure reported for each (OTC vs exchange traded) in a separate supplemental Excel file submitted as supporting documentation.

Firms should report both house and client exposures to the CCPs, either in the case in which the firm is acting as a financial intermediary on behalf of a client and enters into an offsetting transaction with the CCP or the case in which the firm guarantees the performance of the CCP or exchange to the client. Gross CE, Net CE, and CVA (as defined in column instructions below) should include all exposures to the CCP, such as default fund contributions, initial margin, variation margin, and any other collateral provided to the CCP that exceeds contract MtM amounts. For a CCP whose rule book is in place so that variation margin is considered as a settlement payment for the exposures that arise from marking to fair value, with a title to the payment being transferred to the receiving party, firms should treat variation margin posted or received from a CCP as part of the Mark-to-Market (MtM) consistent with SR 17-7.<sup>40</sup>

Additionally, Total Notional, New Notional During Quarter, Weighted Average Maturity, Position MtM, and Total Net Collateral, as reported on sub-schedules L.1.a-b and Stressed EEs, as reported on sub-schedule L.2.a-b, should also include the firm's exposures to the CCPs.

If a firm takes a CVA on a CCP and that CVA falls into either the top 95% of firm total unstressed CVA or the top 95% of firm total stressed CVA, that CCP should be reported on sub-schedules L.1.a-b, L.2.a-b and L.3.a-b. Exposure to CCPs should be included in aggregate exposures reported on both sub-schedules L.1.e and L.5. On sub-schedule L.1.e.3, CCP exposure should be reported in collateralized netting sets if the collateral is legally enforceable. Otherwise, the exposure should be reported in uncollateralized netting sets on sub-schedule L.1.e.4. To the extent that a CCP is not reported on sub-schedules L.1.a-b (and thereby neither on sub-schedules L.2.a-b, nor on L.3.a-b), the exposure to the CCP should be included in sub-schedule L.1.f. If a CCP falls into any top 10 counterparty list on sub-schedule L.4, it should be reported. All CCPs should be reported on sub-schedule L.5, regardless of whether a CVA is taken against the CCP.

In the case a CCP itself is the bi-lateral counterparty to a derivative or SFT, then the CCP must be included in the consideration of which bi-lateral counterparties are the "top 25" as ranked by the ranking methodologies outlined in sub-schedule L.5.

## Regular/Unstressed and CCAR/Stressed Submissions

Regular submissions of this schedule (i.e. without stressed information) must be submitted for all four quarters, including the CCAR as-of quarter, following the regular FR Y-14Q submission deadlines. As noted at the beginning of the FR Y-14Q instructions, the deadline for the regular/unstressed submission of the CCAR as-of quarter is the same as FR Y-14Q Schedule F (Trading), which is 52 calendar days after the notification date (notifying respondents of the as-of-date) or March 15, whichever comes earlier. The as-of date for this regular/unstressed submission for the CCAR quarter is the as-of date for the global market shock and should match the counterparties reported for the CCAR as-of quarter. In addition, a submission for the CCAR as-of quarter must be submitted with stressed information by April 5th. Unstressed information must be provided with the CCAR/stressed submission **unless it was already provided with the CCAR as-of quarter regular/unstressed submission.**

## Sub-schedule Instructions

<sup>40</sup> <https://www.federalreserve.gov/supervisionreg/srletters/sr1707a1.pdf>

# DRAFT

## **L.1.a – Top consolidated/parent counterparties comprising 95% of firm unstressed CVA, ranked by unstressed CVA**

Report information for the top consolidated/parent counterparties that comprise 95% of firm total unstressed CVA, at the counterparty legal entity level.

## **L.1.b – Top consolidated/parent counterparties comprising 95% of firm stressed CVA, ranked by Federal Reserve Severely Adverse Scenario stressed CVA for the CCAR quarter**

Report information for the top consolidated/parent counterparties that comprise 95% of firm total stressed CVA under the Federal Reserve Severely Adverse Scenario, at the counterparty legal entity level. If a counterparty level entity is already reported on sub-schedule L.1.a, do not duplicate information for that counterparty. Report only any additional counterparty legal entities needed to arrive at the counterparties that comprise Top 95% of stressed CVA. Counterparty legal entities should only be reported once across sub-schedules L.1.a-b.

## **Item Instructions (L.1.a – L.1.b)**

### **Rank (CACVM899)**

Report the rank of the consolidated/parent counterparty as ordered by unstressed CVA (for sub-schedule L.1.a) and by the Federal Reserve Severely Adverse Scenario stressed CVA (for sub-schedule L.1.b).

### **Consolidated/Parent Counterparty Name (CACVM900)**

Report the consolidated group/parent level counterparty name that is alphabetically recognizable rather than an alphanumeric code. This name must be reported consistently across all sub-schedules L.1-L.5.

### **Consolidated/Parent Counterparty ID (CACVM901)**

Report the unique identifier (for example, alphanumeric) assigned to the counterparty name reported in the Consolidated/Parent Counterparty Name column. This [ID](#) must be unique and consistent across all sub-schedules L.1-L.5.

### **Counterparty Legal Entity Name (CACN9017)**

Report the unique counterparty legal entity name that is alphabetically recognizable rather than an alphanumeric code. This name must be reported consistently across all sub-schedules L.1-L.5.

### **Counterparty Legal Entity Identifier (LEI) (CACV9224)**

Report the official globally recognized legal entity identifier (LEI) of the counterparty legal entity. If a globally recognized LEI is unavailable, a unique identifier (for example, alphanumeric) assigned to the legal entity reported in the Counterparty Legal Entity Name column must be reported. This ID must be unique and consistent across all sub-schedules L.1-L.5.

### **Netting Set ID (CACVM902)**

Report the unique identifier (for example, alphanumeric) assigned to the netting set. Netting sets should map to ISDA master netting agreements. If a netting set ID is not applicable (~~for example, given no netting agreement in place~~) then this field must be populated with “NA”. This ID must be unique and consistent across all sub-schedules L.1-L.5.

### **Sub-netting Set ID (CACVM903)**



# DRAFT

Use if CVA is calculated below the netting set level. Report the unique identifier (for example, alphanumeric) assigned to the sub-netting set. If a sub-netting set ID is not applicable then this field must be populated with "NA". This ID must be unique and consistent across all sub-schedules L.1-L.5.

## Industry Code (CACVR620)

Report the four to six digit numeric code that describes the primary business activity of the counterparty legal entity according to the North American Industry Classification System (NAICS). Six digit code required for all financial counterparties. If a NAICS industry is not available, report the relevant Global Industry Classification Standard (GICS) industry. If neither NAICS nor GICS industries are available, report the relevant Standard Industrial Classification (SIC) industry.

## Country (CACVM905)

Report the country of domicile of the counterparty legal entity. BHCs, IHCs, or and SLHCs may also report country of risk, but the firm must then provide details in the methodology documentation, including the list of counterparties for whom this alternate approach is selected. Countries should be identified using the standard ISO two-letter codes available at <https://www.iso.org/>. For supranational entities report "XX."

## Internal Rating (CACVM906)

Report the BHC's or IHC's or SLHC's internal rating of the counterparty legal entity that is immediately facing the firm. If there are multiple ratings associated with the different netting sets of the counterparty, the mean or median internal rating should be used. Elaborate in the documentation the approach to selecting the internal rating for these types of counterparties. As a reminder, even if there are multiple internal ratings for a counterparty, there is always only one CDS for that counterparty. All data should be reported at the level at which CVA is calculated; thus every counterparty must have only one CDS spread associated with it. See above for definition of a counterparty.

## External Rating (CACVM907)

Report the external rating equivalent to the counterparty's legal entity internal rating, not the external rating associated with the specific counterparty. Provide an external rating from a Nationally Recognized Statistical Rating Organization (NRSRO).

## Gross Current Exposure (Gross CE) (CACVM908)

Report Gross CE, which is defined as pre-collateral exposure after bilateral counterparty netting. Sometimes referred to as the replacement cost or current credit exposure, Gross CE is the fair value of a derivative contract when that fair value is positive. Gross CE is zero when the fair value is negative or zero. For purposes of this schedule, Gross CE to an individual counterparty should be derived as follows: Determine whether a legally enforceable bilateral netting agreement is in place between the BHC or IHC or SLHC and the counterparty. If such an agreement is in place, the fair values of all applicable derivative contracts with that counterparty that are included in the scope of the netting agreement are netted to a single amount, which may be positive, negative, or zero. Report Gross CE when the fair value is positive, report it as a zero when the fair value is negative or zero.

## Stressed Gross Current Exposure (Gross CE) (Severely Adverse - CACVM909; BHC or IHC or SLHC - CACVM911)

Report the full revaluation of Gross CE under applicable stressed conditions.

## Net Current Exposure (Net CE) (CACVM912)

Report the sum of positive Gross CE netting agreements for a given counterparty less the value of collateral posted by the counterparty to secure those trades. Net CE should be reported after counterparty netting and after collateral. Net CE should reflect any excess collateral posted by the BHC or IHC or SLHC to the counterparty. Net CE should not reflect collateral that was called but not yet exchanged. Only collateral that

# DRAFT

was actually exchanged should be incorporated in the Net CE reporting.

## **Stressed Net CE (Severely Adverse - CACVM913; BHC or IHC or SLHC - CACVM915)**

Report the full revaluation of Net CE under applicable stressed conditions. Hold collateral constant; assume no additional collection of collateral, but do apply stressed conditions to collateral.

## **Total Notional (CACVJF39)**

The gross notional amount of all derivatives positions associated with the reported amount in the item Gross CE. For contracts with variable notional principal amounts, the basis for reporting is the notional principal amounts at the time of reporting. The total should include the sum of notional values of all contracts with a positive market value and contracts with a negative market value. When derivatives position has multiple legs, the firm should report maximum notional value across all legs.

## **New Notional During Quarter (CACVJD56)**

The gross notional amount of ~~all the~~ positions ~~outstanding for the population of trades~~ that were entered into during the reporting quarter. ~~Firms should exclude positions that are originated and settled in the same reporting period or intra quarter trading activities, which expired before the reporting date. Live compression trade activities at the reporting date with new trade start date within the quarter should be included.~~

## **Weighted Average Maturity (CACVJD57)**

The average of time to maturity in years for all positions associated with the reported amount in the item Gross CE, as weighted by the gross notional amount associated with a given position. For trades with Optional Early Termination (OET), the maturity reporting should not take into account such early termination features. For trades with Mandatory Early Termination (MET), however, the maturity reporting should take into account such early termination features. Firms should report the average time to legal maturity in years, inclusive of OETs or METs.

## **Position ~~Mark-to-Market M+M~~ (CACVJD58)**

The net mark-to-market of all positions associated with the item Gross CE not including collateral. This amount could be positive or negative.

## **Total Net Collateral (CACVJD59)**

The amount of net mark-to-market value of all collateral associated with the item Gross CE. This netting is computed as the amount received less the amount posted, i.e. net received amounts would be reported as positive.

## **CVA (CACVM916)**

Report the balance of all CVA, gross of hedges, for asset-side, unilateral CVA. Report CVA as a positive value. CVA is an adjustment made to the market or fair value of derivatives receivables and fair-valued SFTs to take into account the credit risk of a counterparty. This is different from "Net CVA", which would be equivalent to CVA less debt valuation adjustment (DVA). Provide an explanation for counterparties where this does not hold (e.g., adjustments). By requiring unilateral CVA, the default risk of the counterparty should not be conditioned on the survival of the reporting institution. Note that CVA hedges should not be included in this schedule. CVA Hedges should be reported separately in its own FRY-14Q Trading Schedule, F.

## **Stressed CVA (Severely Adverse - CACVM917; BHC or IHC or SLHC - CACVM921)**

The full revaluation of asset-side CVA under stressed conditions. Stressed CVA should incorporate the full revaluation of exposure, probability of default (PD), and loss given default (LGD) under stressed conditions.



# DRAFT

Stressed CVA needs to be calculated for the FR specification under the FR scenarios and the BHC or IHC or SLHC specification under the BHC or IHC or SLHC scenario.

## **Credit Support Annex (CSA) in place? (CACVM922)**

Report the indication of whether at least one of the netting sets comprising this counterparty has a legally enforceable collateral agreement, for example, Credit Support Annex (CSA), in place. "Y" for yes, "N" for no.

## **% Gross Current Exposure (Gross CE) with CSAs (CACVM923)**

Report the percentage of Gross CE that is associated with netting sets that have a legally enforceable collateral agreement in place. For example, if there are two netting sets, one collateralized and one not, with equal Gross CEs in both netting sets, report a value of 50%.

## **Downgrade trigger modeled? (CACVM924)**

Per existing guidance, report this field NA.

## **Single Name Credit Hedges (CACVM925)**

Report the net notional amount of single name credit hedges on the default of the counterparty, including only single name CDS on the counterparty as a reference entity. Report net bought protection as negative values and net sold protection as positive values.

## **L.1.e — Aggregate CVA Data by Ratings and Collateralization**

This sub-schedule is comprised of four tables, as described below:

e.1 Aggregate CVA data: Report aggregate data in columns as described below. The aggregate line items should equal the sum of the three tables of data below: Additional/Offline CVA Reserves, Collateralized Netting Sets and Uncollateralized Netting Sets.

e.2 Additional/Offline CVA Reserves: Report aggregate data for additional offline CVA in columns as described below. If there is a Gross CE or a Net CE figure associated with these reserves, those should be reported as well. If not, enter "0". Accompanying documentation should elaborate about the nature of these reserves.

e.3 Collateralized netting sets sorted by internal rating: Report aggregate data for collateralized netting sets by internal ratings category in columns as described below. Include only netting sets with a CSA agreement in place.

e.4 Uncollateralized netting sets sorted by internal rating: Report aggregate data for uncollateralized netting sets (netting sets without a CSA agreement in place) by internal ratings category in columns as described below.

The internal ratings categories reported on L.1.e must be the same as those reported on L.5.3.

## **Item Instructions**

### **Internal Rating (CACVM906)**

Report the BHC's or IHC's or SLHC's internal rating of the counterparty **legal entity** that is immediately facing the firm. If there are multiple ratings associated with the different netting sets of the counterparty, the mean or median internal rating should be used. Elaborate in the documentation the approach to selecting the internal rating for these types of counterparties. As a reminder, even if there are multiple internal ratings for a counterparty, there is always only one CDS for that counterparty legal entity. All data should be reported at the level at which CVA is calculated for the firm; thus every counterparty must have only one CDS spread associated with it. The same mean or median rating scheme should apply to sub-schedule L.1.a. See above for definition of a counterparty.

### **External Rating (CACVM907)**

# DRAFT

Report the external rating equivalent to the counterparty legal entity's internal rating, not the external rating associated with the specific counterparty. Provide an external rating from a Nationally Recognized Statistical Rating Organization (NRSRO).

## **Gross Current Exposure (Gross CE) excluding CCPs (CACVM919)**

Report Gross CE, which is defined as pre-collateral exposure after bilateral counterparty netting. Sometimes referred to as the replacement cost or current credit exposure, Gross CE is the fair value of a derivative contract when that fair value is positive. Gross CE is zero when the fair value is negative or zero. For purposes of this schedule, Gross CE to an individual counterparty should be derived as follows: Determine whether a legally enforceable bilateral netting agreement is in place between the BHC or IHC or SLHC and the counterparty. If such an agreement is in place, the fair values of all applicable derivative contracts with that counterparty that are included in the scope of the netting agreement are netted to a single amount, which may be positive, negative, or zero. Report Gross CE when the fair value is positive, report it as a zero when the fair value is negative or zero.

## **Gross Current Exposure (Gross CE) to CCPs (CACVM920)**

Report the Gross CE that is a result of transactions conducted through CCPs.

## **Stressed Gross Current Exposure (Gross CE) excluding CCPs (Severely Adverse - CACLR485)**

Report the full revaluation of Gross CE excluding CCPs under applicable stressed conditions.

## **Stressed Gross Current Exposure (Gross CE) to CCPs (Severely Adverse - CACLR489)**

Report the full revaluation of Gross CE to CCPs under applicable stressed conditions.

## **Stressed Gross Current Exposure (Gross CE) BHC or IHC or SLHC scenario (CACLM911)**

Report the full revaluation of Gross CE under applicable stressed conditions.

## **Net Current Exposure (Net CE)——excluding CCPs (CACLR517)**

Report the sum of positive Gross CE netting agreements for a given counterparty less the value of collateral posted by the counterparty to secure those trades. Net CE should be reported after counterparty netting and after collateral. Net CE should reflect any excess collateral posted by the BHC or IHC or SLHC to the counterparty. Net CE should not reflect collateral that was called but not yet exchanged. Only collateral that was actually exchanged should be incorporated in the Net CE reporting.

## **Net Current Exposure (Net CE) to CCPs——(CACLR518)**

Report the Net CE that is a result of transactions conducted through CCPs.

## **Stressed Net Current Exposure (Net CE) excluding CCPs (Severely Adverse - CACLR519)**

Report the full revaluation of Net CE excluding CCPs under applicable stressed conditions. Hold collateral constant; assume no additional collection of collateral, but do apply stressed conditions to collateral.

## **Stressed Net Current Exposure (Net CE) to CCPs (Severely Adverse - CACLR520)**

Report the full revaluation of Net CE to CCPs under applicable stressed conditions.

## **Stressed Net Current Exposure (Net CE) BHC or IHC or SLHC scenario (CACLM915)**

Report the full revaluation of Net CE under applicable stressed conditions.

## **CVA (CACLM916)**

Report the balance of all CVA, gross of hedges, for asset-side, unilateral CVA. Report CVA as a positive value. CVA is an adjustment made to the market or fair value of derivatives receivables and fair-valued SFTs to

# DRAFT

take into account the credit risk of a counterparty. This is different from "Net CVA", which would be equivalent to CVA less debt valuation adjustment (DVA). Provide an explanation for counterparties where this does not hold (e.g., adjustments). By requiring unilateral CVA, the default risk of the counterparty should not be conditioned on the survival of the reporting institution. Note that CVA hedges should not be included in this schedule. CVA Hedges should be reported separately in its own FRY-14Q Trading Schedule, F.

## **Stressed CVA (Severely Adverse - CACLM917; BHC or IHC or SLHC - CACVM921)**

The full revaluation of asset-side CVA under stressed conditions. Stressed CVA should incorporate the full revaluation of exposure, probability of default (PD), and loss given default (LGD) under stressed conditions. Stressed CVA needs to be calculated for the FR specification under the FR scenarios and the BHC or IHC or SLHC specification under the BHC or IHC or SLHC scenario.

## **Single Name Credit Hedges (CACVM925)**

Report the net notional amount of single name credit hedges on the default of the counterparty, including only single name CDS on the counterparty as a reference entity. Report net bought protection as negative values and net sold protection as positive values.

## **Additional/offline CVA reserves**

Report Additional or offline CVA reserves, including Risks Not in CVA, Wrong Way Risk, Offline Reserves, or any other applicable, non-standard add-ons, that are not explicitly included in the Expected Exposure (EE) profile on sub-schedule L.2 or Credit Quality on sub-schedule L.3. If there is a Gross CE or a Net CE figure associated with these reserves, those should be reported as well. If not, enter "0". Accompanying documentation should provide a detailed breakdown and elaborate about the nature of these reserves. The amounts must be reported into one of five categories: model/infrastructure limitations, trades not captured, fair-valued SFTs, offline reserves, Funding Valuation Adjustment (if applicable), and other as described below:

- a) Model/infrastructure limitations: Risk factor not captured in the underlying pricing model or simulated in the simulation model. Please provide a break-out between pricing model and simulation model limitations in the supporting documentation.
- b) Trades not captured: Types of trades or counterparties for which CVA is computed outside of a firm's regular CVA systems. For example, this case may arise due to the trade's complexity or because it is a novel instrument for which a firm's regular CVA systems may not be suitable to compute CVA. For these, the firm may have a CVA approximation methodology such that the information required to be reported in sub-schedules L.2, and L.3 are not available/applicable. Trades that do not attract CVA for public financial statement reporting under GAAP or applicable standard but are subject to the scope of CCAR stressed CVA estimation may also qualify for this category. If a firm has fair-valued SFTs which meet the above mentioned criteria, it should not report in this category, and instead in the next category (b.1).
- b.1) Fair-valued Securities Financing Transactions (SFT): SFTs that are fair valued, where the firm's CVA estimation is conducted outside of its regular CVA systems as described in the Trades not captured category.
- c) Offline reserves: Offline reserves held at the discretion of Finance
- d) Funding Valuation Adjustment (FVA) (if applicable): Funding Valuation Adjustment (if applicable)
- e) Other: Includes any additional items that do not fall in the four categories listed above. Please provide a detailed description and breakout of the components of this section in the supporting documentation.

## **Collateralized counterparty**

A collateralized counterparty is a counterparty with at least one netting set with a legally enforceable

# DRAFT

collateral agreement in place.

## **Collateralized netting set**

Netting sets with a CSA agreement in place and for which only financial collateral applies.

### **L.1.f — Residual counterparty summary metrics by collateralization, industry, region, and ratings**

Report information for the counterparty legal entities that are not already reported on sub-schedules L.1.a or L.1.b. This sub-schedule is comprised of two tables, as described below:

f.1 Residual counterparties: collateralized netting sets (netting sets with a CSA agreement in place)

f.2 Residual counterparties: uncollateralized netting sets

## **Item Instructions**

### **Industry Code (CACLR620)**

Report the four to six digit numeric code that describes the primary business activity of the counterparty legal entity according to the North American Industry Classification System (NAICS). Six digit code required for all financial counterparties. If a NAICS industry is not available, report the relevant Global Industry Classification Standard (GICS) industry. If neither NAICS nor GICS industries are available, report the relevant Standard Industrial Classification (SIC) industry.

### **Region (CACLH167)**

Report the following regional grouping of counterparties as per “Regional Groupings” in FR Y-14Q Trading Schedule F as follows:

- Advanced Economies
- Emerging Europe
- Latin America & Caribbean
- Asia Ex-Japan
- Middle East & North Africa
- Sub-Saharan Africa

### **Internal Rating (CACVM906)**

Report the BHC's or IHC's [or SLHC's](#) internal rating of the counterparty legal entity that is immediately facing the firm. If there are multiple ratings associated with the different netting sets of the counterparty, the mean or median internal rating should be used. Elaborate in the documentation the approach to selecting the internal rating for these types of counterparties. As a reminder, even if there are multiple internal ratings for a counterparty, there is always only one CDS for that counterparty legal entity. All data should be reported at the level at which CVA is calculated for the firm and for which how the firm is mapping; thus every counterparty must have only one CDS spread associated with it. The same mean or median rating scheme should apply to sub-schedule L.1.a. See above for definition of a counterparty.

### **External Rating (CACVM907)**

Report the external rating equivalent to the counterparty legal entity's internal rating, not the external rating associated with the specific counterparty. Provide an external rating from a Nationally Recognized Statistical Rating Organization (NRSRO).

### **Gross [Current Exposure \(Gross CE\)](#) excluding CCPs (CACVM919)**

Report Gross CE, which is defined as pre-collateral exposure after bilateral counterparty netting. Sometimes referred to as the replacement cost or current credit exposure, Gross CE is the fair value of a derivative contract when that fair value is positive. Gross CE is zero when the fair value is negative or zero.

# DRAFT

For purposes of this schedule, Gross CE to an individual counterparty should be derived as follows: Determine whether a legally enforceable bilateral netting agreement is in place between the BHC or IHC or SLHC and the counterparty. If such an agreement is in place, the fair values of all applicable derivative contracts with that counterparty that are included in the scope of the netting agreement are netted to a single amount, which may be positive, negative, or zero. Report Gross CE when the fair value is positive, report it as a zero when the fair value is negative or zero.

## **Gross Current Exposure (Gross CE) to CCPs (CACVM920)**

Report the Gross CE that is a result of transactions conducted through CCPs.

## **Stressed Gross Current Exposure (Gross CE) excluding CCPs (Severely Adverse - CACLR485)**

Report the full revaluation of Gross CE excluding CCPs under applicable stressed conditions.

## **Stressed Gross Current Exposure (Gross CE) to CCPs (Severely Adverse - CACLR489)**

Report the full revaluation of Gross CE to CCPs under applicable stressed conditions.

## **Stressed Gross Current Exposure (Gross CE) BHC or IHC or SLHC scenario (CACLM911)**

Report the full revaluation of Gross CE under applicable stressed conditions.

## **Net Current Exposure (Net CE)——excluding CCPs (CACLR517)**

Report the sum of positive Gross CE netting agreements for a given counterparty less the value of collateral posted by the counterparty to secure those trades. Net CE should be reported after counterparty netting and after collateral. Net CE should reflect any excess collateral posted by the BHC or IHC or SLHC to the counterparty. Net CE should not reflect collateral that was called but not yet exchanged. Only collateral that was actually exchanged should be incorporated in the Net CE reporting.

## **Net Current Exposure (Net CE) to CCPs——(CACLR518)**

Report the Net CE that is a result of transactions conducted through CCPs.

## **Stressed Net Current Exposure (Net CE) excluding CCPs (Severely Adverse - CACLR519)**

Report the full revaluation of Net CE excluding CCPs under applicable stressed conditions. Hold collateral constant; assume no additional collection of collateral, but do apply stressed conditions to collateral.

## **Stressed Net Current Exposure (Net CE) to CCPs (Severely Adverse - CACLR520)**

Report the full revaluation of Net CE to CCPs under applicable stressed conditions.

## **Stressed Net Current Exposure (Net CE) BHC or IHC or SLHC scenario (CACLM915)**

Report the full revaluation of Net CE under applicable stressed conditions.

## **CVA (CACLM916)**

Report the balance of all CVA, gross of hedges, for asset-side, unilateral CVA. Report CVA as a positive value. CVA is an adjustment made to the market or fair value of derivatives receivables and fair-valued SFTs to take into account the credit risk of a counterparty. This is different from "Net CVA", which would be equivalent to CVA less debt valuation adjustment (DVA). Provide an explanation for counterparties where this does not hold (e.g., adjustments). By requiring unilateral CVA, the default risk of the counterparty should not be conditioned on the survival of the reporting institution. Note that CVA hedges should not be included in this schedule. CVA Hedges should be reported separately in its own FR Y-14Q Trading Schedule F.

## **Stressed CVA (Severely Adverse - CACLM917; BHC or IHC or SLHC - CACVM921)**

# DRAFT

The full revaluation of asset-side CVA under stressed conditions. Stressed CVA should incorporate the full revaluation of exposure, probability of default (PD), and loss given default (LGD) under stressed conditions. Stressed CVA needs to be calculated for the FR specification under the FR scenarios and the BHC or IHC [or SLHC](#) specification under the BHC or IHC scenario.

## Single Name Credit Hedges (CACVM925)

Report the net notional amount of single name credit hedges on the default of the counterparty, including only single name CDS on the counterparty as a reference entity. Report net bought protection as negative values and net sold protection as positive values.

## Item Instructions (L.2.a-L.2.b)

### L.2—EE profile by counterparty

## Column Instructions

### Rank (CACVM899)

Report the rank of the consolidated/parent counterparty as ordered by unstressed CVA (for sub-schedule L.2.a) and by the Federal Reserve Severely Adverse Scenario stressed CVA (for sub-schedule L.2.b).

### Consolidated/Parent Counterparty Name (CACBM900)

Report the consolidated group/parent level counterparty name that is alphabetically recognizable rather than an alphanumeric code. The name must be reported consistently across all sub-schedules L.1-L.5.

### Consolidated/Parent Counterparty ID (CACBM901)

Report the unique identifier (for example, alphanumeric) assigned to the counterparty name reported in the Consolidated/Parent Counterparty Name column. This ID must be unique and consistent across all sub-schedules L.1-L.5.

### Counterparty Legal Entity Name (CACN9017)

Report the unique counterparty legal entity name that is alphabetically recognizable rather than an alphanumeric code. This name must be reported consistently across all sub-schedules L.1-L.5.

### Counterparty Legal Entity Identifier (LEI) (CACB9224)

Report the official globally recognized legal entity identifier (LEI) of the counterparty legal entity. If a globally recognized LEI is unavailable, a unique identifier (for example, alphanumeric) assigned to the legal entity reported in the Counterparty Legal Entity Name column must be reported. This ID must be unique and consistent across all sub-schedules L.1-L.5.

### Netting Set ID (CACBM902)

Report the unique identifier (for example, alphanumeric) assigned to the netting set. Netting sets should map to ISDA master netting agreements. If a netting set ID is not applicable ~~(for example, given no netting agreement in place)~~ then this field must be populated with “NA”. This ID must be unique and consistent across all sub-schedules L.1-L.5.

### Sub-netting Set ID (CACBM903)

Use if CVA is calculated below the netting set level. Report the unique identifier (for example,



# DRAFT

alphanumeric) assigned to the sub-netting set. If a sub-netting set ID is not applicable [then](#) this field must be populated with “NA”. This ID must be unique and consistent across all sub-schedules L.1-L.5.

## **Industry Code (CACBR620)**

Report the four to six digit numeric code that describes the primary business activity of the counterparty legal entity according to the North American Industry Classification System (NAICS). Six digit code required for all financial counterparties. If a NAICS industry is not available, report the relevant Global Industry Classification Standard (GICS) industry. If neither NAICS nor GICs industries are available, report the relevant Standard Industrial Classification (SIC) industry.

## **Country (CACBM905)**

Report the country of domicile of the counterparty legal entity. BHCs and IHCs may also report country of risk, but the firm must then provide details in the methodology documentation, including the list of counterparties for whom this alternate approach is selected. Countries should be identified using the standard ISO two-letter codes available at <https://www.iso.org/>. For supranational entities report “XX.”

## **Internal Rating (CACBM906)**

Report the BHC’s or IHC’s or SLHC’s internal rating of the counterparty legal entity that is immediately facing the firm. If there are multiple ratings associated with the different netting sets of the counterparty, the mean or median internal rating should be used. Elaborate in the documentation the approach to selecting the internal rating for these types of counterparties. As a reminder, even if there are multiple internal ratings for a counterparty, there is always only one CDS for that counterparty. All data should be reported at the level at which CVA is calculated; thus every counterparty must have only one CDS spread associated with it. See above for definition of a counterparty.

## **External Rating (CACBM907)**

Report the external rating equivalent to the counterparty legal entity's internal rating, not the external rating associated with the specific counterparty. Provide an external rating from a Nationally Recognized Statistical Rating Organization (NRSRO).

## **Tenor bucket in years (CACBM928)**

The time provided should be as granular as possible. Use years as the unit. For example, if the time is 6 months, the BHC, IHC and SLHC should report “0.5” not “6”.

Tenor buckets are defined as the time between time  $t$  and time  $t-1$ . Therefore if the value provided is one year, and the previous time provided is 6 months, the tenor bucket over which marginal (forward) probabilities of default is calculated would be from 6 months to one year. Typically EE will be calculated at time  $t$  (the endpoint of the tenor bucket). If not, clarify if the value provided corresponds to a midpoint during the tenor bucket, an average, or some other value.

The level of granularity of future revaluation time buckets should be at the level used to calculate CVA at the BHC or IHC, and the data provided should be as granular as available.

## **[Expected Exposure \(EE\)](#) - BHC or IHC or SLHC specification (CACBP799)**

The (unstressed) EE metric used to calculate CVA for each tenor bucket. Along each simulation path, the exposure at time  $t$  used to estimate  $EE(t)$  should be non-negative; if any exposures along a simulation path calculated at time  $t$  are negative, these should be set to 0 before calculating the expected value. The EE reference point refers to the end-point of the time bucket between time  $t$  and  $t-1$ . A time bucket is considered the time between time  $t$  and time  $t-1$ . Indicate in separate methodology notes if another approach is used (e.g., average over time bucket, mid- point, etc.).

EE (unstressed) should be calculated using the BHC’s or IHC’s or SLHC’s own specification.

# DRAFT

## **Marginal Probability of Default (PD) (CACBQ451)**

Value provided should be the interpolated unilateral marginal PD for each time bucket between time  $t$  and  $t-1$ . For most BHCs and IHCs, marginal PD will reflect default probability over tenor bucket and be equivalent to the difference between the cumulative PD at the beginning and the end of the tenor bucket. If not, provide additional explanation. PDs should not be conditioned on the survival of the BHC or IHC or SLHC.

## **Loss Given Default (LGD) (CVA) (CACBQ667)**

Loss Given Default (1-Recovery Rate) used to calculate CVA.

## **Discount factor (CACBR486)**

Report discount factor used to calculate unstressed CVA. The discount factor should be roughly equal to  $e^{-zt}$  or  $(1+z)^{-t}$ , where  $z$  is the value of the zero curve at time  $t$  for the LIBOR or some other risk free rate.

## **Stressed Expected Exposure (EE) - FR scenario & FR specification (Severely Adverse - CACBR487)**

Stressed EE calculated under the Federal Reserve (FR) shock scenario using the FR specification. Calculate the EE under the FR specification with a 10 day margin period of risk (MPOR) for all counterparties for which collateral is collected, and exclude the collection of additional collateral due to downgrade of a counterparty (i.e., downgrade triggers).

## **Stressed Expected Exposure (EE) - BHC or IHC or SLHC scenario & BHC or IHC or SLHC specification (CACBR491)**

Stressed EE calculated under the BHC or IHC or SLHC shock scenario using the BHC's and IHC's own specification.

## **Stressed Marginal Probability of Default (PD) (Severely Adverse - CACBR492; BHC or IHC or SLHC - CACBR494)**

The (unilateral) marginal PD associated with the counterparty's stressed spread. PDs should not be conditioned on the survival of the BHC or IHC or SLHC.

## **Stressed Loss Given Default (LGD) (CVA) (Severely Adverse - CACBR495; BHC or IHC or SLHC - CACBR497)**

LGD used to calculate CVA in the applicable stressed scenario.

## **Stressed Loss Given Default (LGD) (PD) (Severely Adverse - CACBR498; BHC or IHC or SLHC - CACBR500)**

LGD used to calculate PD in the applicable stressed scenario.

## **Stressed Discount Factor (Severely Adverse - CACBR523; BHC or IHC or SLHC - CACBR525)**

Report the discount factor used to calculate CVA in the applicable stressed scenario.



# DRAFT

## Item Instructions (L.3.a-L.3.b)

### L.3—Credit Quality by Counterparty

#### Column Instructions

##### **Rank (CACVM899)**

Report the rank of the consolidated/parent counterparty as ordered by unstressed CVA (for sub-schedule L.3.a) and by the Federal Reserve Severely Adverse Scenario stressed CVA (for sub-schedule L.3.b).

##### **Consolidated/Parent Counterparty Name (CACQM900)**

Report the consolidated group/parent level counterparty name that is alphabetically recognizable rather than an alphanumeric code. The name must be reported consistently across all sub-schedules L.1-L.5.

##### **Consolidated/Parent Counterparty ID (CACQM901)**

Report the unique identifier (for example, alphanumeric) assigned to the counterparty name reported in the Consolidated/Parent Counterparty Name column. This ID must be unique and consistent across all sub-schedules L.1-L.5.

##### **Counterparty Legal Entity Name (CACN9017)**

Report the unique counterparty legal entity name that is alphabetically recognizable rather than an alphanumeric code. This name must be reported consistently across all sub-schedules L.1-L.5.

##### **Counterparty Legal Entity Identifier (LEI) (CACQ9224)**

Report the official globally recognized legal entity identifier (LEI) of the counterparty legal entity. If a globally recognized LEI is unavailable, a unique identifier (for example, alphanumeric) assigned to the legal entity reported in the Counterparty Legal Entity Name column must be reported. This ID must be unique and consistent across all sub-schedules L.1-L.5.

##### **Netting Set ID (CACQM902)**

Report the unique identifier (for example, alphanumeric) assigned to the netting set. Netting sets should map to ISDA master netting agreements. If a netting set ID is not applicable ~~(for example, given no netting agreement in place)~~ then this field must be populated with “NA”. This ID must be unique and consistent across all sub-schedules L.1-L.5.

##### **Sub-netting Set ID (CACQM903)**

Use if CVA is calculated below the netting set level. Report the unique identifier (for example, alphanumeric) assigned to the sub-netting set. If a sub-netting set ID is not applicable then this field must be populated with “NA”. This ID must be unique and consistent across all sub-schedules L.1-L.5.

##### **Industry Code (CACQR620)**

Report the four to six digit numeric code that describes the primary business activity of the counterparty legal entity according to the North American Industry Classification System (NAICS). Six digit code required for all financial counterparties. If a NAICS industry is not available, report the relevant Global Industry Classification Standard (GICS) industry. If neither NAICS nor GICS industries are available, report the relevant Standard Industrial Classification (SIC) industry.

##### **Country (CACQM905)**

Report the country of domicile of the counterparty legal entity. BHCs and IHCs may also report country of risk, but the firm must then provide details in the methodology documentation, including the list of counterparties for whom this alternate approach is selected. Countries should be identified using the

# DRAFT

standard ISO two-letter codes available at <https://www.iso.org/>. For supranational entities report "XX."

## **Internal Rating (CACQM906)**

Report the BHC's or IHC's or SLHC's internal rating of the counterparty legal entity that is immediately facing the firm. If there are multiple ratings associated with the different netting sets of the counterparty, the mean or median internal rating should be used. Elaborate in the documentation the approach to selecting the internal rating for these types of counterparties. As a reminder, even if there are multiple internal ratings for a counterparty, there is always only one CDS for that counterparty. All data should be reported at the level at which CVA is calculated; thus every counterparty must have only one CDS spread associated with it. See above for definition of a counterparty.

## **External Rating (CACQM907)**

Report the external rating equivalent to the counterparty legal entity's internal rating, not the external rating associated with the specific counterparty. Provide an external rating from a Nationally Recognized Statistical Rating Organization (NRSRO).

## **Time period (CACQR501)**

The date for which the CDS (or other input) applies. For a one year CDS spread, enter "1". For grid pricing, do not enter the interpolated CDS spreads. Enter only the dates for which market data was available.

## **Market spread (bps) (CACQR502)**

Enter the market value. If this value comes from a proxy grid, enter the value from the grid. The whole grid is not necessary. For example, if the grid is computed based on 1, 3, 5, and 10 years spreads, enter only 1, 3, 5, and 10 year data. All spread data should be reported as the all-in-cost spread, with any upfront costs incorporated into the current all-in spread.

## **Spread adjustment (bps) (CACQR503)**

Provide the amount and operator (e.g., "\*" and "+") of adjustments (in bps), if any, applied to the market spread. This field should be blank if no add-on is used.

## **Spread (bps) used in CVA calculation (CACQR504)**

Enter the value used in the CVA calculation. This may be left blank if the market spread of the single name or proxy is used without any adjustment.

## **Stressed spreads (Severely Adverse - CACQR505; BHC or IHC or SLHC - CACQR507)**

The stressed values of CDS spreads used in the stressed CVA calculation.

## **Mapping approach (CACQR508)**

Indicate the type of proxy mapping approach used. Report either Single name own or Proxy in this field. Single name own indicates that the single name reference entity is the same as the counterparty legal entity. Proxy indicates that the counterparty's own spread was not used; rather, a proxy spread was used.

## **Proxy mapping approach (CACQR509)**

If single name own approach is not used, indicate the type of proxy mapping approach used. Report one of the following: Single name-related party, Industry (indicate industry based on list provided above), Ratings class (indicate the rating; e.g., AAA, AA), Industry-rating, Industry-geography, Industry-rating-geography, Rating-geography, or Other. This field may be left blank when mapping approach is Single name own.

## **Proxy name (CACQR510)**

Identify the specific proxy used.

# DRAFT

**Market input type (CACQR511)**

Indicate the type of market input used, by reporting one of the following in this field: CDS spreads, Bond spreads, KMV-EDFs, or Other.

**Ticker / identifier (CACQR512)**

Where applicable, enter the ticker number used (e.g., CDX IG AA, single name ticker).

**Report date (CACQR513)**

Enter the date of the market data.

**Source (CACQR514)**

Enter the source of the market data (e.g., Bloomberg, Markit).

**Comments (CACQR515)**

Enter any relevant comments.

# DRAFT

## L.4— Aggregate and Top 10 CVA Sensitivities by Risk Factor

This schedule collects sensitivity information of aggregate asset-side CVA based on changes in underlying risk factors. A sensitivity refers to a 1 unit change in the risk factor, and a slide refers to a larger change in the risk factor. Report an increase in CVA as a positive figure. Reported figures should be gross of CVA hedges. Sensitivities are collected in aggregate, i.e. across all positions for which CVA is taken, and for the 10 consolidated counterparties with the largest sensitivities to a given risk factor (i.e. top 10 by factor). Please report at the consolidated group/parent level, reporting only 10 entries per risk factor.

### **Aggregate CVA sensitivities by risk factor**

The BHC or IHC or SLHC may provide their own values for slides (e.g., +20bps instead of +10bps). However, if a BHC or IHC or SLHC chooses to report slides other than those listed, at least one slide must be consistent with the size of the shock to that risk factor under the FR scenario. All slides should be reported only if they are based on a full revaluation of the portfolio given the change in the risk factor; slides should not be reported if they are simple linear scaling of the associated sensitivity. At a minimum there should be slides that represent a significant positive and negative move for that risk factor. For credit, when a basis point move is requested, this refers to an absolute move in the risk factor, and when a percentage move is requested, this refers to the relative move in the risk factor.

### **Top 10 CVA sensitivities by risk factor**

For each risk factor, report the change in CVA for each of the top 10 parent/consolidated counterparties most sensitive to a 1bp or 1% increase, depending on risk factor. Report an increase in CVA as a positive figure. Reported sensitivities should be gross of CVA hedges.

### **Other material sensitivities**

Material sensitivities are other large and/or important risk factors for the BHC or IHC or SLHC. Add the relevant risk factors for the BHC or IHC or SLHC. **This information is reported across all counterparties for each material sensitivity; unlike prescribed risk factors, there is currently no requirement to report top 10 counterparties for each “other material sensitivity”.** The label must clearly identify the risk factor. If an additional risk factor is provided that is not listed in the template, provide a description of this sensitivity in the supporting documentation. For example, for equity indices, include a reference to the country or region to which index corresponds.

## **Item Instructions (L.4.a-L.4.b)**

### **Risk factor category (CACUR526)**

Report the risk factor category associated with the reported sensitivity. The risk factors consist of specified factors (see report form) and other material sensitivities that are determined by the respondent.

### **Risk factor description (CACUW899)**

Report a brief description of the risk factor.

### **Consolidated/Parent Counterparty Name (CACQM900)**

Report the consolidated group/parent level counterparty name that is alphabetically recognizable rather than an alphanumeric code. This name must be reported consistently across all sub-schedules L.1-L.5.

### **Consolidated/Parent Counterparty ID (CACQM901)**

Report the unique identifier (for example, alphanumeric) assigned to the counterparty name reported in

# DRAFT

the Consolidated/Parent Counterparty Name column. This ~~counterparty~~-ID must be unique and consistent across all sub-schedules L.1-L.5.

## **Risk factor slide (CACUR527)**

Report the movement of the risk factor associated with the reported sensitivity.

## **Risk sensitivity (CACUR528)**

Report the change in asset-side CVA for a given change in the underlying risk factor, gross of CVA hedges.

# DRAFT

## L.5— Derivatives and Securities Financing Transactions (SFT) Profile

This sub-schedule collects information about, G-7 sovereigns,<sup>41</sup> CCPs,<sup>42</sup> and IHC's affiliates<sup>43</sup> and other top counterparties associated with SFTs and/or derivative positions at the level of position netting. The first sub-schedule (L.5.1) is intended to identify the counterparties to these types of positions for all ranking methodologies and associated exposures. Counterparties must be ranked by each methodology to determine which must be reported. For ranking purposes, top counterparties should be identified based on the exposure amount at a consolidated counterparty level, using the ranking methodology described distinctly between CCAR vs non-CCAR quarter as below; and for reporting purposes, the range of exposure fields for a consolidated counterparty must be reported at the level of position netting. All G-7 sovereigns and CCPs, and IHC's affiliates should be reported, regardless of which ranking methodology is used, in addition to the Top 25 counterparties by ranking methodologies (including non G-7s sovereigns and non CCPs, and IHC's non-affiliate) as specified below.

The subsequent sub-schedules (L.5.2 and L.5.4) are intended to provide more detailed exposure information to the counterparties identified in the first sub-schedule L.5.1. For sub-schedule L.5.3, Aggregate SFTs exposures should be reported by internal ratings.

For non-CCAR (unstressed) quarter, all G-7 sovereigns and CCPs, and IHC's affiliates plus Top 25 non G-7/non CCP/IHC's non-affiliate counterparties should be reported, ranked by Total Net CE.

For as-of-CCAR (stressed) quarter, all G-7 sovereigns and CCPs, and IHC's affiliates plus Top 25 non G-7 sovereign/non CCP/IHC's non-affiliate counterparties should be reported, ranked by Total Stressed Net CE under the Federal Reserve Severely Adverse Stressed Scenario.

~~For SFTs, exclude intraday transactions and prime brokerage margin lending. Include situations in which the firm is acting as a principal or on behalf of a client (agent) for which lender indemnification has been provided against the borrower's default. The counterparty to be reported is the consolidated organization that is a legal principal in the transaction (i.e. not the agent).~~

For derivatives, each consolidated counterparty's exposure amounts reported on this schedule should be calculated using the same netting methodology as used in sub-schedules L.1a-L.1d. For example, the aggregate of the positive derivative mark-to-market netting set information for a consolidated counterparty/ legal entity should equal the Gross CE for that same counterparty on L.1. While there are cross-netting and other exceptions that prevent exact equivalence, the amounts should generally be the same.

Reported mark-to-market amounts must reflect the positive or negative contribution to exposure upon counterparty default and close-out netting. For example, if margin or collateral is posted to a counterparty, this would be reported as a positive amount and if collateral is received from a counterparty, this would be reported a negative amount. In the case of netting collateral posted against collateral received, net posted positions would be reported as a positive amount and net received positions would be reported as a negative amount. Similarly, if a position has positive mark-to-market value from the perspective of the respondent, the mark-to-market value would be reported as positive and reflected as positive when

---

<sup>41</sup> G7 includes Canada, France, Germany, Italy, Japan, the United Kingdom, and the United States. The reporting firm should use the definition of sovereign exposure to be consistent with section .2 of the regulatory capital rules (12 CFR 217).

<sup>42</sup> CCP includes both qualifying central counterparties (QCCP) or non-QCCP as defined in section .2 of the regulatory capital rules (12 CFR 217).

<sup>43</sup> As in the US final rule pursuant to the Dodd-Frank Act for Single Counterparty Credit Limits, an affiliate of the company includes a parent company of the counterparty, as well as any other firm that is consolidated with the counterparty under applicable accounting standards including US GAAP or IFRS.

# DRAFT

performing netting computations against negative mark-to-market positions. Additionally, purchased single-name CDS hedge notional amounts must be reflected as negative, and sold single-name CDS exposure must be reflected as positive.

For positions with no legal agreement, mark-to-market amounts can be aggregated and reported as a single record and must reflect actual mark-to-market amounts. The aggregated record must have the item Legal Enforceability reported as “N” and Netting Set ID should be reported as “None”.

All CCPs ~~and~~ G-7 sovereign, **as well as any of the IHC’s affiliate counterparties**, counterparties should be reported, regardless of which ranking methodology is used.

## Netting Agreement Reporting:

Information must be reported for each netting agreement held with a legal entity of a consolidated counterparty organization, even if the net current exposure for a given netting agreement is zero. **Below are some examples:**

- (1)** For example, if a counterparty has two subsidiaries, and two netting agreements have been executed with the first subsidiary and one agreement with the second subsidiary, then three lines of information would be reported for that counterparty.
- (2)** If there are positions with a counterparty where no bilateral close-out netting agreement exists, those must be aggregated and reported as a single record with Legal Enforceability identified as “N”, ~~and~~ Agreement Type identified as “None”, **and Netting Set ID that is ‘NA’.**
  - a.** In this case, when the Mark-to-Market (MtM) amounts are aggregated across positions for which there is no netting agreement in place, the firm should report a single record on a gross basis such that the positive and negative MtM amounts are not offset to each other. In these situations, the firm should only aggregate those positions that have positive MtM amounts.
  - b.** When the net current exposures are aggregated across positions for which there is no netting agreement in place, each position’s current exposure should be first floored at zero before summing across those non-negative values.
- (3)** For positions where there is a netting agreement in place but it is not legally enforceable, firms should treat these positions as if there is no legal agreement for purposes of reporting exposure information, aggregating the sum across trades without offsetting amounts at the netting agreement level. In these situations, certain data fields such as Minimum Transfer Amount or Thresholds that pertain to agreement details should be left blank. Netting Set ID should be reported as a unique alphanumeric identifier other than ‘NA’.
- (4)** In cases where mixed legal opinions exist for the legal enforceability of a netting agreement, firms should apply the methodologies that are consistent with the treatment for the regulatory capital rules (12 CFR 217) and report the relevant data fields accordingly.
- (5)** In cases where more than one CSA exists for a netting agreement, the firm may report at the level of netting agreement by collapsing the CSAs (Y or N) to the respective reporting line item for that counterparty by legal enforceability. In cases where there exist multiple CSAs with different contractual features per netting agreement, the firm may report certain margin agreement details (such as agreement type, CSA contractual features, non-cash collateral type, threshold, minimum transfer amount CP, margin frequency) at a margin agreement level. For doing so, firms should use the Netting Set ID naming convention in a manner that is a concatenation of a unique identifier assigned to a netting agreement and that to a margin agreement.

~~In this case, when the Mark to Market (MtM) amounts are aggregated for purposes of reporting as a single record, the firm may offset negative MtM from positive MtM amounts. When the net current exposures are aggregated across positions for which there is no netting agreements in place, each~~

# DRAFT

~~position's current exposure should be first floored at zero before summing across those non-negative values.~~

## L.5.1— Derivative and SFT information by counterparty legal entity and netting set/agreement

### Line Item Instructions

Report the information required by each column for all CCPs, G-7 sovereign entities, and the top consolidated/parent counterparties as ranked by all methodologies outlined in the general instructions above for this sub-schedule. ~~In addition, the IHC is also required to include any of its affiliate counterparty information in this sub-schedule.~~ If a counterparty would be reported under more than one ranking methodology, the information for that counterparty must only be reported once. .

There are columns (Rank Methodology and Rank) in which each ranking methodology and rank should be identified for each reported counterparties. All 4 ranking methodologies should be reported in one table in the firm's XML submission.

~~For data fields that do not specifically indicate population (Derivatives and/or SFTs), fields are applicable to both Derivatives and SFTs.~~

### Column Instructions

#### Rank Methodology (CACNJD60)

Indicate which ranking methodology applies to the reported counterparties. Allowable entries are QCCP, NQCCP ~~and~~ G7, AF, and NA, when the reported counterparty is qualifying CCP, non-qualifying CCP, ~~or~~ G7 sovereign, ~~IHC's affiliate counterparty, or others, respectively. Report NA when the reported counterparties are not QCCP, NQCCP, G7, or AF. For purposes of determining qualifying CCP versus non-qualifying CCP, the firm should apply the same conditions as specified in section .2 of the regulatory capital rule (12 CFR 217).~~

#### Rank (CACNM899)

Report the rank of the consolidated/parent counterparty as ordered by the rank methodology indicated. For qualifying CCPs and non-qualifying CCPs ~~as defined in section .2 of the regulatory capital rule (12 CFR 217)~~, specify rank as "QCCP" and "NQCCP", respectively; for G-7 sovereigns, ~~and IHC affiliate counterparties~~ specify rank as "G7" ~~and "AF", respectively.~~

#### Consolidated/Parent Counterparty Name (CACNM900)

Report the name of the consolidated group/parent level counterparty that is either a CCP, G-7 sovereign country, ~~the IHC's affiliate counterparty~~ or one of the top 25 counterparties. The counterparty name should be alphabetically recognizable rather than an alphanumeric code and must be reported consistently across sub-schedules L.1-L.5.

#### Consolidated/Parent Entity Counterparty ID (CACNM901)

Report the unique identifier (for example, alphanumeric) assigned to the counterparty name reported in the Consolidated/Parent Counterparty Name column. This counterparty ID must be unique and consistent across sub-schedules L.1-L.5.

#### Counterparty Legal Entity Name (CACN9017)

Report the unique name of the counterparty legal entity with whom the netting agreement was executed. This could be a subsidiary or affiliate of the consolidated/parent organization or the consolidated/parent



# DRAFT

organization itself. This name must be alphabetically recognizable rather than an alphanumeric code, and reported consistently across sub-schedules L.1-L.5.

## **Counterparty Legal Entity Identifier (LEI) (CACNR621)**

Report the official globally recognized legal entity identifier (LEI) of the counterparty legal entity. If a globally recognized LEI is unavailable, a unique identifier (for example, alphanumeric) assigned to the legal entity reported in the Counterparty Legal Entity Name column must be reported. This ID must be unique and consistent across sub-schedules L.1-L.5.

## **Netting Set ID (CACNM902)**

Report the unique identifier (for example, alphanumeric) assigned to the netting set. Netting sets should map to ISDA master netting agreements. If a netting set ID is not applicable (~~for example, given no netting agreement in place~~) then this field must be populated with "NA". This ID must be unique and consistent across sub-schedules L.1-L.5.

## **Industry Code (CACNR620)**

Report the four to six digit numeric code that describes the primary business activity of the counterparty legal entity according to the North American Industry Classification System (NAICS). Six digit code required for all financial counterparties. If a NAICS industry is not available, report the relevant Global Industry Classification Standard (GICS) industry. If neither NAICS nor GICS industries are available, report the relevant Standard Industrial Classification (SIC) industry.

## **Country (CACNM905)**

Report the country of domicile of the counterparty legal entity. BHCs and IHCs may also report country of risk, but the firm must then provide details in the methodology documentation, including the list of counterparties for whom this alternate approach is selected. Countries should be identified using the standard ISO two-letter codes available at <https://www.iso.org/>. For supranational entities report "XX."

## **Internal Rating (CACNM906)**

Report the BHC's or IHC's or SLHC's internal rating of the counterparty legal entity. If there are multiple ratings associated with the different netting sets of the counterparty, the mean or median internal rating should be used. Elaborate in the documentation the approach to selecting the internal rating for these types of counterparties. As a reminder, even if there are multiple internal ratings for a counterparty, there is always only one CDS for that counterparty. All data should be reported at the level at which CVA is calculated; thus every counterparty must have only one CDS spread associated with it. See above for definition of a counterparty.

## **External Rating (CACNM907)**

Report the external rating equivalent to the counterparty legal entity's internal rating, not the external rating associated with the specific counterparty. Provide an external rating from a Nationally Recognized Statistical Rating Organization (NRSRO).

## **Agreement Type (CACNR529)**

For SFTs, allowable entries are SFT Repo, SFT Sec Lending, and SFT Cross-product. "SFT Repo" covers both repos and reverse repos, while "SFT Sec Lending" covers both securities lending and securities borrowing agreements. "SFT Cross-product" agreements cover netting agreements where there is cross-product netting (e.g. reverse repo and securities borrowing), if a legal opinion on legal enforceability on close-out has been obtained.

For derivatives, when at least one of the netting sets comprising this counterparty has a legally enforceable collateral agreement, for example, Credit Support Annex (CSA), identify the type of CSA. Allowable entries in this case are Derivatives 1-way CSA, Derivatives 2-way SCSA, Derivatives 2-way old CSA, Derivatives

# DRAFT

Centrally Cleared. When there is no legally enforceable collateral agreement, allowable entry is “Derivatives no CSA”.

When agreements cover netting agreements where there is cross-product netting between SFTs and derivatives, report “SFT Derivatives Cross-product”.

The firm should report “None” in cases where there is no bilateral close-out netting agreement in place, or there is no legal enforceability to an agreement, as described in the instructions for the sub-schedule L.5 under the Netting Agreement Reporting section above. The firm should report “Other” in cases where none of the above allowable entries appropriately represents the characteristics of the exposure being reported.

## Agreement Role (CACNR530)

For SFTs, identify whether the respondent is defined in the netting agreement as a principal to the transactions, an agent on behalf of a client, or a client. Allowable entries are: Principal, Agent, ~~or~~ Client. ~~These entries are only applicable for SFTs. For derivatives, report “NA”. For purposes of reporting 'Principal', 'Agent' or 'Client', the firm should identify which role it is playing in the transactions from the firm's perspectives. For example, the firm should report 'Principal' when it is a counterparty in a given trade; 'Agent' when the firm is acting on behalf of a principal lender; 'Client' when the firm is the client, whereby an Agent (e.g., other financial institution) acts on behalf of the firm.~~

For derivatives, report only when the firm serves as a clearing member of a CCP or an exchange; the reported counterparty is a non CCP; and that the firm has a direct or indirect credit exposure to a client on a derivative transaction. Report Principal when the respondent is a clearing member acting as a financial intermediary on behalf of a client and enters into an offsetting transaction with the CCP or the exchange; Agent when the respondent is a clearing member of a CCP or an exchange and it provides a guarantee of the client's performance to the CCP or the exchange. Report “NA” otherwise (i.e., when the respondent's transactions do not relate to centrally cleared or exchange traded derivatives; the reported counterparty is a CCP, or the respondent is a clearing member of a CCP or an exchange and it does not guarantee the client's performance to the CCP or exchange). Allowable entries are: Principal, Agent, or NA.

## Legal Enforceability (CACNR534)

Per your firm's assessment, indicate whether the netting agreement is legally enforceable in the jurisdiction of the counterparty legal entity. Such a situation might arise if the counterparty legal entity is a sovereign, and close-out netting is not enforceable in that jurisdiction. Possible options are Yes and No (reported as “Y” or “N”). Note that for situations for which there is no close-out netting agreement between the parties (i.e. no netting), this field should be marked as “N”.

## Initial Margin (CACSR551)

Report the *net* amount of initial margin posted to the reporting firm by the counterparty legal entity if the margin posted by the reporting firm to the counterparty legal entity is not held in a bankruptcy remote account; and report only the margin the reporting firm received from the counterparty legal entity if the margin posted by the reporting firm to the counterparty legal entity is held in a bankruptcy remote account. Do not report the margin that the reporting firm posted to the counterparty legal entity in a manner that is held in a bankruptcy remote account. The initial margin may be in the form of cash and/or securities; report the aggregate MtM value of cash and securities. Margin that was called but not yet exchanged should not be included; and only those margin that was actually exchanged should be reported.

## Non-Cash Collateral Type (CACSR552)

Identify the type(s) of non-cash collateral or initial margin allowed under the agreement. All posted collateral/initial margin types should be reported and separated by a comma. Possible options are: U.S. Debt, Non-U.S. Sovereign Debt, Investment Grade Corporate Debt, Public Equity, Public Convertibles, and Other.

# DRAFT

## **Excess Variation Margin (for CCPs) (CACSR553)**

The total amount of excess variation margin (mark-to-market margin posted by the BHC or IHC or SLHC in excess of the CCP's requirements) **reflected at each day close of business** posted to the CCP legal entity under the agreement if the margin is not held in a bankruptcy remote account. Do not report the excess variation margin held in a bankruptcy remote account. **For example, if a CCP that the firm is transacting with has a practice of directly withdrawing/paying any excess variation margin amount each day, and thereby zero amount at the end of the day, the firm may report zero.** Margin that was called but not yet exchanged should not be reported. Only margin that was actually exchanged should be reported.

## **Default Fund (for CCPs) (CACSR554)**

The amount required under the agreement to be contributed to the default fund of a CCP legal entity. This amount, if positive, must be reported for all CCPs including those with which the respondent has no active trades.

## **Threshold CP (CACSR555)**

The threshold amount for the BHC's or IHC's or SLHC's counterparty at the netting set level, which is equivalent to the amount of exposure that the BHC or IHC or SLHC party is willing to have to its counterparty before the counterparty is required to post collateral to the BHC or IHC or SLHC.

## **Threshold BHC or IHC or SLHC (CACSR556)**

The threshold amount for the BHC or IHC or SLHC, which is equivalent to the amount of exposure that its counterparty is willing to have to the BHC or IHC or SLHC before the BHC or IHC or SLHC is required to post collateral to its counterparty.

## **Minimum Transfer Amount CP (CACSR557)**

The minimum amount that must be transferred to the counterparty for any margin call.

## **Minimum Transfer Amount BHC or IHC or SLHC (CACSR558)**

The minimum amount that must be transferred to the BHC or IHC or SLHC for any margin call.

## **Margining Frequency (CACSR559)**

The frequency (in business days) of margin calls, per the netting agreement.

## **CSA contractual features (non-vanilla) (CACSR560)**

Indicates if any of the transactions conducted under the agreement have any non-vanilla contractual features. Possible options are: Downgrade Trigger, Break Clause – Mandatory, Break Clause – Optional, and Other. If more than one applies for a given netting set, list them all (comma separated).

## **Wrong Way Risk Position (CACNR535)**

Indicates if any of the individual transactions conducted under the agreement with the given counterparty legal entity is considered a wrong-way risk position. Possible options are Specific, General, and None. The BHC, IHC and SLHC should use its internal BAU risk management process to determine whether an given transaction with the specific counterparty legal entity is a wrong-way risk position, and if so whether it constitutes "specific" WWR or not. If a netting agreement contains both specific WWR and non-specific WRR positions, report as Specific.

## **Total Net Current Exposure (Net CE) (Unstressed – CACNR550)**

The total net current exposure to the counterparty legal entity for the netting agreement under close-out. The BHC or IHC should report the sum of positive Gross CE for a given netting agreements associated with a counterparty less the value of collateral posted by the counterparty to secure those trades. Net CE should be reported after counterparty netting and after collateral. Net CE should reflect any excess collateral posted by the BHC or IHC to the counterparty. Net CE should not reflect collateral that was called but not yet exchanged. Only collateral that was actually exchanged should be incorporated in the Net CE reporting.

# DRAFT

This item is intended to capture all exposures (both SFTs and derivatives) to a consolidated counterparty and reported once at the legal-entity level. This item should not be repeated across Netting Set IDs associated with the legal entity.

## **Total Stressed Net Current Exposure (Net CE) (Severely Adverse - CACNR536)**

This field must be reported for CCAR as-of date only. The BHC or IHC should report this field based on the full revaluation of Net CE for both derivative and SFT exposures to the legal entity under the FR stressed market environment – one value for each supervisory global market shock scenario. The global market shock should be applied to all assets, including collateral, prior to application of the max function. For a single netting agreement, this is calculated as the greater of zero and the difference between the aggregate stressed mark-to-market value of securities or cash posted to the counterparty legal entity and the aggregate stressed mark-to-market value of securities or cash received from that counterparty legal entity. This item is intended to capture all exposures (both SFTs and derivatives) to a consolidated/parent counterparty and reported once at the legal entity level. This item should not be repeated across Netting Set IDs associated with the legal entity.

## **Net Current Exposure (Net CE) SFTs (CACNM912)**

The current exposure to the counterparty legal entity for the netting set under close-out. For a single netting set, this is calculated as the greater of zero and the difference between the aggregate mark-to-market value of securities or cash posted to the counterparty legal entity and the aggregate mark-to-market value of securities or cash received from that counterparty legal entity. Net CE should not reflect collateral (cash or securities) that was called but not yet exchanged. Only collateral that was actually exchanged should be incorporated in the Net CE reporting.

## **Stressed Net Current Exposure (Net CE) SFTs (Severely Adverse –CACNR538)**

The full revaluation of Net CE *for SFTs* under the FR stressed market environment – one value for each supervisory global market shock scenario. . The global market shock should be applied to all assets, including collateral, prior to application of the max function.

## **Net Current Exposure (Net CE) Derivatives (CACSJF40)**

The current exposure to the counterparty legal entity for the netting set under close-out for derivatives. For a single netting set, this is calculated as the greater of zero and the difference between the aggregate mark-to-market value of the derivative positions with the counterparty legal entity and the aggregate mark-to-market value of collateral received from that counterparty legal entity. This should be the same definition as in sub-schedule L.1.

## **Stressed Net Current Exposure (Net CE) Derivatives (Severely Adverse-CACSR564)**

The full revaluation of Net CE Derivatives under the FR stressed market environment – one value for each supervisory global market shock scenario. The global market shock should be applied to all assets, including collateral, prior to application of the max function.

## **Unstressed Mark-to-Market M&M (Derivatives) (CACSR566)**

The mark-to-market value of derivative positions in the record, not including collateral but including netting of positions where legally binding. This could be a positive or negative value. The aggregate of the positive amounts for a given consolidated/parent counterparty should be equivalent to the derivative Gross CE for the consolidated/parent counterparty on sub-schedule L.1a-d.

When either netting agreement is not in place or the agreement exists but it is not a legally-enforceable netting agreement is not in place, this should be a sum of only positive mark-to-market values across the positions that are the positive and negative mark to market values across positions associated with the consolidated/parent counterparty. In these situations, the firm are not allowed to offset positive and negative M&M amounts.

# DRAFT

## **Unstressed Mark-to-Market Posted (SFTs) (CACNR544)**

The gross cumulative mark-to-market (MtM) value of the cash and assets posted to the legal entity under the netting agreement. If the netting agreement comprises several netting sets, report the sum of the MtM posted values for those netting sets that are in the money (have a net positive MtM amount).

## **Unstressed Mark-to-Market Received (SFTs) (CACNR545)**

The gross cumulative mark-to-market (MtM) value of the cash and assets received from the legal entity under the netting agreement. If the netting agreement comprises several netting sets, report the sum of the MtM received values for those netting sets that are in the money (have a net positive MtM amount). These amounts must be reported reflecting their actual mark-to-market amount, i.e., positive mark-to-market values should be reported as positive.

## **Stressed Mark-to-Market (Derivatives) (Severely Adverse - CACSR567)**

The mark-to-market value of exposure based on the full revaluation of all derivatives under the agreement, as revalued according to the supervisory global market shock scenarios, not including collateral but including netting of positions where legally binding. This could be a positive or negative value.

## **Stressed Mark-to-Market Posted (SFTs) (Severely Adverse - CACNR540)**

The gross cumulative MtM values using full revaluation under each supervisory global market shock scenario of the cash and assets reported in the mark-to-market Posted column. If the netting agreement comprises several netting sets, report the sum of the Stressed MtM posted values for those netting sets that are in the money (have a net positive MtM amount).

## **Stressed Mark-to-Market Received (SFTs) (Severely Adverse - CACNR542)**

The gross cumulative MtM values using full revaluation under each supervisory global market shock scenario of the cash and assets reported in the mark-to-market Received column. If the netting agreement comprises several netting sets, report the sum of the Stressed MtM received values for those netting sets that are in the money (have a net positive MtM amount). These amounts must be reported reflecting their actual mark-to-market amount, i.e., positive mark-to-market values should be reported as positive.

## **Unstressed Mark-to-Market Cash Collateral (Derivatives) (USD – CACSJF43; EUR – CACSJF44; GBP – CACSJF45; JPY – CACSJF46; Other – CACSJF47)**

The mark-to-market (MtM) value of *net* cash collateral posted by the counterparty legal entity under the netting agreement, in the respective currency. This could be a positive or negative value. ~~All collateral reported should be eligible financial collateral.~~ This amount is sub-divided by currency in the subsequent columns ~~and should be reported in the USD equivalent of the respective currency bucket, as opposed to the local currency of the respective currency bucket.~~

## **Total Unstressed Mark-to-Market Collateral (Derivatives) (CACSR575)**

The net mark-to-market (MtM) value of all collateral, ~~in the USD equivalent of the respective currency bucket, as opposed to the local currency of the respective currency bucket,~~ posted by the counterparty legal entity under the netting agreement. All collateral reported should be eligible financial collateral.

## **Stressed Mark-to-Market Cash Collateral (Derivatives) (Severely Adverse: USD – CACSJF48, EUR – CACSJF49, GBP – CACSJF50, JPY – CACSJF51, Other – CACSJF52)**

The mark-to-market (MtM) value of the net cash collateral reported in column Total Unstressed MtM Cash Collateral as revalued under the supervisory global market shock scenarios. This amount is sub-divided by currency in the subsequent columns.

## **Total Stressed Mark-to-Market Collateral (Derivatives) (Severely Adverse - CACSR578)**

The mark-to-market (MtM) value of *all* collateral reported in the column Total Unstressed MtM Collateral, as revalued under the supervisory global market shock scenarios.



# DRAFT

## CDS Reference Entity Type (CACNR546)

The type of institution for which the five-year CDS spread is being reported. The possible options are CP Legal Entity, CP Parent, and Proxy. Use Proxy if and only if there is no internal mark for the counterparty legal entity or its parent and provide the BHC's or IHC's or SLHC's internal proxy CDS spread under Counterparty Credit Spread and a commercially available CDS identifier under Counterparty Legal Entity Identifier (see below). **In cases where a firm uses non-commercially available internal marks such as ratings-based composite curves, the firm should also report it as 'Proxy'.** In all other cases, if there is an internal mark for the counterparty legal entity, choose "CP Legal Entity", otherwise choose "CP Parent".

## 5Y CDS Spread (bp) (CACNR547)

The five-year CDS spread for counterparty for which the reference entity is either the counterparty legal entity, the consolidated/parent organization, or the Proxy.

## Wrong Way Risk Hedge (CACSR583)

Indicates if any portion of the CDS hedges are wrong-way risk positions with respect to the CDS counterparty and the CDS reference entity. The BHC or IHC or SLHC should use its internal BAU risk management process to determine whether the CDS protection (e.g. sovereign CDS) with the specific counterparty legal entity (e.g. bank in the sovereign) is a wrong-way hedge. Possible options are "Y" and "N".

## CDS Hedge Notional (CACSR584)

The net notional amount of specific CDS hedges on the derivatives under the agreement. **The only specific CDS hedges eligible that are allowed to be reported included are bought plain vanilla CDS protection (single-name and non-tranched index credit derivatives for which, one of the constituents matches directly to, where the index includes the counterparty legal entity as one of the reference entities) which do not have any non-vanilla contractual features, and do not constitute wrong way positions.** The positions reported must be "eligible credit derivatives" as defined in section .71 of 12 CFR 252. When calculating the net notional, purchased CDS hedge notional amounts must be reflected as negative, and sold amounts must be reflected as positive.

## Stressed CVA (Severely Adverse - CACSR590)

CVA for the derivatives within the agreement as evaluated under the supervisory global market shock scenarios.

## L.5.2—SFT assets posted and received by counterparty legal entity and netting set/agreement and asset category

### Line Item Instructions

Report the information required by each column for each consolidated/parent counterparty reported in L.5.1, including the CCPs and G-7 sovereign countries, with whom SFTs are held. **In addition, an IHC is also required to report in this sub-schedule its exposures to affiliate counterparties with whom SFTs are held.** In the case a CCP itself is the bi-lateral counterparty to a SFT, then the CCP must be included in the consideration of which bi-lateral counterparties are the "top 25" as ranked by the ranking methodologies. **Information in this schedule is reported at the level of netting agreements.**

#### Netting Agreement Reporting:

Information must be reported for each netting agreement held with a legal entity of a consolidated/parent counterparty organization, even if the net current exposure for a given netting agreement is zero. For example, if a counterparty has two subsidiaries, and two netting agreements have been executed with the first subsidiary and one agreement with the second subsidiary, then three lines of information would be

# DRAFT

reported for that counterparty. These must correspond to the netting agreements and associated netting agreement IDs reported in L.5.1.

## Item Instructions

### Rank Methodology (CACNJD60)

Indicate which ranking methodology applies to the reported counterparties. Allowable entries are QCCP, NQCCP, ~~and~~ G7, AF, or NA, when the reported counterparty is qualifying CCP, non-qualifying CCP, ~~or~~ G7 sovereign, IHC's affiliate counterparty, or others, respectively. Report NA when the reported counterparties are not QCCP, NQCCP, G7, or AF. ~~For purposes of determining qualifying CCP versus non-qualifying CCP, the firm should apply the same conditions as specified in section 2 of the regulatory capital rule (12 CFR 217).~~

### Rank (CACNM899)

Report the rank of the consolidated/parent counterparty as ordered according to the rank methodology indicated. For qualifying CCPs and non-qualifying CCPs ~~as defined in section 2 of the regulatory capital rule (12 CFR 217)~~, specify rank as "QCCP" and "NQCCP", respectively; for G-7 sovereigns, ~~and IHC affiliate counterparties~~, specify rank as "G7" ~~and "AF"~~, respectively.

### Consolidated/Parent Counterparty Name (CACNM900)

~~Report t~~The name of the consolidated group/parent level counterparty that is either a CCP, G-7 sovereign country, ~~the IHC's affiliate counterparty~~, or one of the top 25 counterparties. The counterparty name should be alphabetically recognizable rather than an alphanumeric code and must be reported consistently across sub-schedules L.1-L.5.

### Consolidated/Parent Entity Counterparty ID (CACNM901)

Report the unique identifier (for example, alphanumeric) assigned to the counterparty name reported in the Consolidated/Parent Counterparty Name column. The ID must be unique and consistent across sub-schedules L.1-L.5.

### Counterparty Legal Entity Name (CACN9017)

Report the unique name of the counterparty legal entity with whom the netting agreement was executed. This could be a subsidiary or affiliate of the consolidated/parent organization or the consolidated/parent organization itself. This name must be alphabetically recognizable rather than an alphanumeric code, and reported consistently across sub-schedules L.1-L.5.

### Counterparty Legal Entity Identifier (LEI) (CACN9924)

Report the official globally recognized legal entity identifier (LEI) of the counterparty legal entity. If a globally recognized LEI is unavailable, a unique identifier (for example, alphanumeric) assigned to the legal entity reported in the Counterparty Legal Entity Name column must be reported. This ID must be unique and consistent across sub-schedules L.1-L.5.

### Netting Set ID (CACNM902)

Report the unique identifier (for example, alphanumeric) assigned to the netting set. Netting sets should map to ISDA master netting agreements. If a netting set ID is not applicable ~~(for example, given no netting agreement in place)~~ ~~then~~ this field must be populated with "NA". This ID must be unique and consistent across sub-schedules L.1-L.5.

## Asset Categories

**Posted:** the aggregate mark-to-market value of the asset category/sub-category posted to a consolidated/parent counterparty as part of a securities lending/borrowing or repurchase/reverse repurchase agreement. Include situations in which the firm is acting as a principal or on behalf of a client for which lender indemnification has been provided against the borrower's default. If the netting

# DRAFT

agreement comprises several netting sets, report the sum of the posted values for those netting sets that are “in the money”, i.e. have a net positive MtM amount for those netting sets for which the net (stressed) exposure (i.e. exposure net of collateral) is positive under that scenario.

**Received:** the aggregate mark-to-market value of the asset category/sub-category received from a consolidated/parent counterparty as part of a securities lending/borrowing or repurchase/reverse repurchase agreement. Include situations in which the firm is acting as a principal or on behalf of a client for which lender indemnification has been provided against the borrower’s default. If the netting agreement comprises several netting sets, report the sum of the received values for those netting sets that are “in the money”, i.e. have a net positive MtM amount for those netting sets for which the net (stressed) exposure (i.e. exposure net of collateral) is positive under that scenario. These amounts must be reported reflecting their actual mark-to-market amount, i.e. positive mark-to-market values should be reported as positive.

## Central Debt

This category includes debt obligations issued by a sovereign entity or a government-sponsored enterprise (G.S.E.). This category does not include inflation-indexed securities. The amounts must be separated by the sovereign entity sub-categories: United States, Germany, United Kingdom & France, Other Eurozone, Japan, and Other.

Sub-category	Unstressed Posted	Unstressed Received	Stressed Posted FR (Severely Adverse)	Stressed Received FR (Severely Adverse)
United States	CACNFC53	CACNFC83	CACNFD13	CACNFD43
Germany	CACNFC54	CACNFC84	CACNFD14	CACNFD44
United Kingdom & France	CACNFC55	CACNFC85	CACNFD15	CACNFD45
Other Eurozone	CACNFC56	CACNFC86	CACNFD16	CACNFD46
Japan	CACNFC57	CACNFC87	CACNFD17	CACNFD47
Other	CACNFC58	CACNFC88	CACNFD18	CACNFD48

## Equity

This category includes publicly traded and privately issued equity securities. The amounts must be separated by the country in which the issuing entity is domiciled, which are grouped into the following sub-categories: United States, Canada, United Kingdom, Eurozone, and Other.

Sub-category	Unstressed Posted	Unstressed Received	Stressed Posted FR (Severely Adverse)	Stressed Received FR (Severely Adverse)
United States (US)	CACNFC59	CACNFC89	CACNFD19	CACNFD49
Canada (CAD)	CACNFC60	CACNFC90	CACNFD20	CACNFD50
United Kingdom (UK)	CACNFC61	CACNFC91	CACNFD21	CACNFD51
Eurozone	CACNFC62	CACNFC92	CACNFD22	CACNFD52
Other Economies (specify)	CACNFC63	CACNFC93	CACNFD23	CACNFD53



# DRAFT

## Corporate Bonds – Advanced Economies

This category includes all debt obligations issued by any public or private entity that is not backed by the full faith and credit of a single sovereign country; specifically it includes supranationals. This category does not include commercial paper. The issuing entity must be domiciled in a sovereign that is defined as an advanced economy in the instructions for schedule F. The amounts must be separated into two sub-categories: Investment Grade (IG) and Sub-Investment Grade (Sub-IG) as based on the rating of the specific issuances.

<b>Sub-category</b>	<b>Unstressed Posted</b>	<b>Unstressed Received</b>	<b>Stressed Posted FR (Severely Adverse)</b>	<b>Stressed Received FR (Severely Adverse)</b>
Investment Grade (IG)	CACNFC64	CACNFC94	CACNFD24	CACNFD54
Sub-Investment Grade (Sub-IG)	CACNFC65	CACNFC95	CACNFD25	CACNFD55

## Corporate Bonds – Other Economies

This category includes all debt obligations issued by any public or private entity that is not backed by the full faith and credit of a single sovereign country; specifically, it includes supranationals. This category does not include commercial paper. The issuing entity must be domiciled in a sovereign that is not an advanced economy as defined in the instructions for schedule F. The amounts must be separated into two sub-categories: IG and Sub-IG as based on the rating of the specific issuances.

<b>Sub-category</b>	<b>Unstressed Posted</b>	<b>Unstressed Received</b>	<b>Stressed Posted FR (Severely Adverse)</b>	<b>Stressed Received FR (Severely Adverse)</b>
Investment Grade (IG)	CACNFC66	CACNFC96	CACNFD26	CACNFD56
Sub-Investment Grade (Sub-IG)	CACNFC67	CACNFC97	CACNFD27	CACNFD57

## Exchange-Traded Funds

This category includes equity shares of exchange-traded investment funds (ETFs). The amounts must be separated into two sub-categories that define the majority of the assets held by a given ETF: Equity and Fixed Income.

<b>Sub-category</b>	<b>Unstressed Posted</b>	<b>Unstressed Received</b>	<b>Stressed Posted FR (Severely Adverse)</b>	<b>Stressed Received FR (Severely Adverse)</b>
Equity	CACNFC68	CACNFC98	CACNFD28	CACNFD58
Fixed Income	CACNFC69	CACNFC99	CACNFD29	CACNFD59

## U.S. Agency MBS/CMBS

This category includes mortgage-backed securities (MBS) and commercial mortgage-backed securities (CMBS) issued by U.S. government agencies and U.S. government-sponsored enterprises (GSEs), as defined in the FR Y-9C. The amounts must be separated into two sub-categories: Pass-throughs and Other.

<b>Sub-category</b>	<b>Unstressed Posted</b>	<b>Unstressed Received</b>	<b>Stressed Posted FR</b>	<b>Stressed Received</b>
---------------------	--------------------------	----------------------------	---------------------------	--------------------------

# DRAFT

			<b>(Severely Adverse)</b>	<b>FR (Severely Adverse)</b>
Pass-throughs	CACNFC70	CACNFD00	CACNFD30	CACNFD60
Other (specify)	CACNFC71	CACNFD01	CACNFD31	CACNFD61

## Non-Agency RMBS/ABS/CMBS

This category includes residential mortgage-backed securities (RMBS), asset-backed securities (ABS), and CMBS issued by an entity other than U.S. government agencies or U.S. GSEs. The amounts must be separated into two sub-categories: IG and Sub-IG as based on the rating of the specific issuances.

<b>Sub-category</b>	<b>Unstressed Posted</b>	<b>Unstressed Received</b>	<b>Stressed Posted FR (Severely Adverse)</b>	<b>Stressed Received FR (Severely Adverse)</b>
Investment Grade (IG)	CACNFC72	CACNFD02	CACNFD32	CACNFD62
Sub-Investment Grade (Sub-IG)	CACNFC73	CACNFD03	CACNFD33	CACNFD63

## Cash

This category includes cash in any currency and must be separated by currency into the following sub-categories: USD, EUR, GBP, JPY, and Other.

<b>Sub-category</b>	<b>Unstressed Posted</b>	<b>Unstressed Received</b>	<b>Stressed Posted FR (Severely Adverse)</b>	<b>Stressed Received FR (Severely Adverse)</b>
USD	CACNFC74	CACNFD04	CACNFD34	CACNFD64
EUR	CACNFC75	CACNFD05	CACNFD35	CACNFD65
GBP	CACNFC76	CACNFD06	CACNFD36	CACNFD66
JPY	CACNFC77	CACNFD07	CACNFD37	CACNFD67
Other (specify)	CACNFC78	CACNFD08	CACNFD38	CACNFD68

## Other

This category includes all asset types that are not reported in the other defined asset categories. The amounts must be separated by the following sub-categories: Inflation-Indexed Securities, Commercial Paper, Municipal Bonds, and Other. For the amount reported in Other, supporting documentation must be submitted that provides details of the asset types within the sub-category.

<b>Sub-category</b>	<b>Unstressed Posted</b>	<b>Unstressed Received</b>	<b>Stressed Posted FR (Severely Adverse)</b>	<b>Stressed Received FR (Severely Adverse)</b>
Inflation-Indexed Securities	CACNFC79	CACNFD09	CACNFD39	CACNFD69
Commercial Paper	CACNFC80	CACNFD10	CACNFD40	CACNFD70
Municipal Bonds	CACNFC81	CACNFD11	CACNFD41	CACNFD71
Other (specify)	CACNFC82	CACNFD12	CACNFD42	CACNFD72

# DRAFT

## L.5.3— Aggregate SFTs by Internal Rating

### Line Item Instructions

Information must be reported for all counterparties as grouped by internal rating, one line of information for each internal rating. Posted and received amounts by asset category should be reported as actual mark-to-market amounts.

#### **Internal Rating (CACNM906)**

Report the BHC's or IHC's or SLHC's internal rating associated with the group of counterparties included in the reported amounts. Counterparties must be grouped and reported for each internal rating.

#### **External Rating (CACNM907)**

Report the external rating **equivalent to the counterparty's internal rating as reported in the Internal Rating column associated with the group of counterparties included in the reported amounts**. Provide an external rating from a Nationally Recognized Statistical Rating Organization (NRSRO).

#### **Net Current Exposure (Net CE) (CACNM912)**

Report the aggregate Net CE of the counterparties associated with the reported rating bucket.

#### **Stressed Net Current Exposure (Net CE) (Severely Adverse - CACNFD73; BHC or IHC or SLHC - CACNFD75)**

Report the full revaluation of Net CE under applicable stressed conditions. Hold collateral constant; assume no additional collection of collateral, but do apply stressed conditions to collateral.

### Column Instructions (Asset Categories)

#### **Indemnified Securities Lent (Notional Balance) (CACNFD76)**

This category includes securities lent for which the respondent has provided borrower default indemnification to the lender.

#### **Indemnified Cash Collateral Reinvestment (Notional Balance) (CACNFD77)**

This category includes cash that has been delivered as collateral for which the respondent has provided default indemnification to the lender.

#### **US Treasury & Agency (Repo Posted - CACNFD78; Repo Received - CACNFD79; Sec. Lending Posted - CACNFD94; Sec. Lending Received - CACNFD95)**

This category includes all U.S. Treasury securities, obligations issued by U.S. government agencies, and obligations issued by U.S. government-sponsored enterprises (GSEs) as defined in the FR Y-9C.

#### **Agency MBS (Repo Posted - CACNFD80; Repo Received - CACNFD81; Sec. Lending Posted - CACNFD96; Sec. Lending Received - CACNFD97)**

This category includes mortgage-backed securities issued by a U.S. government agency as defined above.

#### **Equities (Repo Posted - CACNFD82; Repo Received - CACNFD83; Sec. Lending Posted - CACNFD98; Sec. Lending Received - CACNFD99)**

This category includes publicly traded and privately issued equity securities.

#### **Corporate Bonds (Repo Posted - CACNFD84; Repo Received - CACNFD85; Sec. Lending Posted - CACNFE00; Sec. Lending Received - CACNFE01)**

This category includes all debt obligations issued by any public or private entity that is not backed by the full faith and credit of a single sovereign country; specifically, it includes supranationals.

# DRAFT

## **Non-Agency (ABS, RMBS) (Repo Posted - CACNFD86; Repo Received - CACNFD87; Sec. Lending Posted - CACNFE02; Sec. Lending Received - CACNFE03)**

This category includes asset-backed securities and residential mortgage-backed securities not issued by a U.S. government agency as defined above.

## **Sovereigns (Repo Posted - CACNFD88; Repo Received - CACNFD89; Sec. Lending Posted - CACNFE04; Sec. Lending Received - CACNFE05)**

This category includes debt issued by any sovereign state or organization backed by the full faith and credit of a sovereign state other than debt issued by the U.S. Treasury or any U.S. Agency.

## **Other (Repo Posted - CACNFD90; Repo Received - CACNFD91; Sec. Lending Posted - CACNFE06; Sec. Lending Received - CACNFE07)**

This category includes any asset not defined in any of the above asset categories (US Treasury, Agency MBS, Equities, Corporate Bonds, Non-Agency (ABS, RMBS), and Sovereigns) and excludes cash.

## **Cash (Repo Posted - CACNFD92; Repo Received - CACNFD93; Sec. Lending Posted - CACNFE08; Sec. Lending Received - CACNFE09)**

This category includes currency to be reported in U.S. dollar amount.

### **L.5.4—Derivative position detail by counterparty legal entity and netting set/agreement and asset category**

#### **Line item Instructions**

Report the information required by each column for all CCPs, G-7 sovereign countries, and the top 25 counterparties that are not CCPs or G-7 sovereign countries. Information must be reported for each consolidated counterparty organization and associated legal entities and netting sets reported in sub-schedule L.5.1 with whom the respondent holds derivative positions. In the case a CCP itself is the bi-lateral counterparty to a derivative agreement, then the CCP must be included in the consideration of which bi-lateral counterparties are the "top 25" as ranked by the ranking methodologies

#### **Rank Methodology (CACSD60)**

Indicate which ranking methodology applies to the reported counterparties. Allowable entries are QCCP, NQCCP ~~and~~ G7, ~~AF, or NA~~ when the reported counterparty is qualifying CCP, non-qualifying CCP, ~~or~~ G7 sovereign, ~~IHC's affiliate counterparty, or others, respectively. Report NA when the reported counterparties are not QCCP, NQCCP, G7, or AF. For purposes of determining qualifying CCP versus non-qualifying CCP, the firm should apply the same conditions as specified in section 2 of the regulatory capital rule (12 CFR 217).~~

#### **Rank (CACSM899)**

Report the rank of the consolidated/parent counterparty as ordered by rank methodology indicated. For qualifying CCPs and non-qualifying CCPs ~~as defined in section 2 of the regulatory capital rule (12 CFR 217)~~, specify rank as "QCCP" and "NQCCP", respectively; for G-7 sovereigns, ~~and IHC affiliate counterparties,~~ specify rank as "G7" ~~and "AF", respectively.~~

#### **Consolidated/Parent Counterparty Name (CACSM900)**

Report the name of the consolidated group/parent level counterparty that is either a CCP, G-7 sovereign country, ~~the IHC's affiliate counterparty,~~ or one of the top 25 counterparties. The counterparty name should be alphabetically recognizable rather than an alphanumeric code and must be reported consistently across sub-schedules L.1-L.5.

#### **Consolidated/Parent Entity Counterparty ID (CACSR619)**

# DRAFT

Report the unique identifier (for example, alphanumeric) assigned to the counterparty name reported in the Consolidated/Parent Counterparty Name column. This ID must be unique and consistent across sub-schedules L.1-L.5.

## Counterparty Legal Entity Name (CAC9017)

Report the unique name of the counterparty legal entity with whom the netting agreement was executed. This could be a subsidiary or affiliate of the consolidated/parent organization or the consolidated/parent organization itself. This name must be alphabetically recognizable rather than an alphanumeric code, and reported consistently across sub-schedules L.1-L.5.

## Counterparty Legal Entity Identifier (LEI)-(CAC922)

Report the official globally recognized legal entity identifier (LEI) of the counterparty legal entity. If a globally recognized LEI is unavailable, a unique identifier (for example, alphanumeric) assigned to the legal entity reported in the Counterparty Legal Entity Name column must be reported. This ID must be unique and consistent across sub-schedules L.1-L.5.

## Netting Set ID (CACSM902)

Report the unique identifier (for example, alphanumeric) assigned to the netting set being reported. Netting sets should map to ISDA master netting agreements. If a netting set ID is not applicable (~~for example, given no netting agreement in place~~) then this field must be populated with "NA". This ID must be unique and consistent across sub-schedules L.1-L.5.

## Derivative Types

Report the unstressed and stressed mark-to-market exposure amounts for the categories of derivatives below. For any derivative contract that contains optionality, "vanilla" means American or European style with no additional contract features. All others should be classified as either "structured" or "exotic." Derivative contracts that do not contain optionality are considered "vanilla."

Firms should use methodologies that they deem appropriate for the basis of classifying vanilla, exotic or structured. In doing so, firms should provide documentation explaining their methodologies. As a rule of thumb, firms may regard vanilla derivatives as European or American style on single underlying entity with no complex payoff features; structured derivatives as types of products that involve multiple underlying entities that are not easily decomposed into individual components; and exotic derivatives as other types of contracts that have complex payoff features that are not regarded as vanilla or structured.

Derivative Type	Unstressed MtM Exposure	Stressed MtM Exposure FR (Severely Adverse)
Vanilla Interest Rate	CACSR592	CACSR606
Vanilla FX	CACSR593	CACSR607
Vanilla Commodity (Cash)	CACSR594	CACSR608
Vanilla Credit	CACSR595	CACSR609
Vanilla Equity	CACSR596	CACSR610
Structured Interest Rate	CACSR597	CACSR611
Flow Exotic and Structured FX	CACSR598	CACSR612
Other Cash & Physical Commodity	CACSR599	CACSR613
Other (Single Name) Credit	CACSR600	CACSR614
Structured (Multi-Name) Credit	CACSR601	CACSR615
Exotic Equity	CACSR602	CACSR616
Hybrids	CACSR603	CACSR617
Structured Products (MBS, ABS, TBAs)	CACSR604	CACSR618

# DRAFT

Other	CACSR605	CACSR655
-------	----------	----------

# DRAFT

## Schedule M—Balances

### Schedule M.1 – Quarter-end Balances

For each line item listed below, report all loans and leases held for investment (HFI) or held for sale (HFS). Include the fair value of all loans held for investment and all loans held for sale that the holding company has elected to report at fair value under a fair value option (FVO). In column A report loans held for investment at amortized cost (HFI at AC) in domestic offices. In column B report loans held for sale or measured at fair value under a fair value option in domestic offices. In column C report loans held for investment at amortized cost in international offices. In column D report loans held for sale or measured at fair value under a fair value option in international offices. Report all dollar amounts in millions.

The balances reported here should be consistent with the balances reported on Schedule HC-C of the FR Y-9C for corresponding line items. For example, the reported balance of loans held in domestic offices secured by first liens on residential real estate (line 1.a.(1).(a), column A + line 1.a.(1).(a), column B + line 1.a.(1).(b), column A, + line 1.a.(1).(b), column B) should equal the balance of such loans reported on Schedule HC-C of the FR Y-9C (line 1.c.(2).(a), column B). A more comprehensive list of relationships between this schedule and the FR Y-9C will be included with the technical instructions provided to all submitting institutions.

#### **Line item 1.a.(1).(a), First mortgages**

Report first mortgage loans that meet the loan criteria defined in FR Y-9C, Schedule HC-C, line 1.c.(2).(a). Do not include first lien closed-end home equity loans.

#### **Line item 1.a.(1).(b), First lien HELOANS**

Report first lien closed-end home equity loans (HELOANS) that meet the loan criteria defined in FR Y-9C, Schedule HC-C, line 1.c.(2).(a). Do not include first mortgages.

#### **Line item 1.a.(2).(a), Junior lien HELOANS**

Report junior lien closed-end home equity loans (HELOANS) that meet the loan criteria defined in FR Y-9C, Schedule HC-C, line 1.c.(2).(b).

#### **Line item 1.a.(2).(b), HELOCs**

Report home equity lines of credit (HELOCs) that meet the loan criteria defined in FR Y-9C, Schedule HC-C, line 1.c.(1).

#### **Line item 1.b.(1), Construction and land development**

Report construction and land development (CLD) loans that meet the loan criteria defined in FR Y-9C, Schedule HC-C, lines 1.a.(1) and 1.a.(2).

#### **Line item 1.b.(2), Multifamily real estate**

Report multifamily real estate loans that meet the loan criteria defined in FR Y-9C, Schedule HC-C, line 1.d.

#### **Line item 1.b.(3).(a), Owner-occupied nonfarm nonresidential**

Report owner occupied nonfarm nonresidential loans that meet the loan criteria defined in FR Y-9C, Schedule HC-C, line 1.e.(1).

#### **Line item 1.b.(3).(b), Non-owner-occupied nonfarm nonresidential**

Report non-owner-occupied loans that meet the loan criteria defined in FR Y-9C, Schedule HC-C, line 1.e.(2).

# DRAFT

## **Line item 1.c, Secured by farmland**

Report loans secured by farmland that meet the loan criteria defined in FR Y-9C, Schedule HC-C, line 1.b.

## **Line item 2.a, Graded C&I loans**

Report graded C&I loans included in FR Y-9C, Schedule HC-C, lines 4.a and 4.b. Also include non-purpose loans reported in lines 4.a and 4.b of Schedule HC-C of the FR Y-9C regardless of whether those loans are graded. Do not include scored or delinquency managed small business loans, small/medium enterprise (SME) cards, or corporate cards.

## **Line item 2.b, Small business loans**

Report small business loans included in FR Y-9C, Schedule HC-C, lines 2.a, 2.b, 3, 4.a, 4.b, 7, 9.a, 9.b.(2), and 10.b. Small business loans are loans that are “scored” or “delinquency managed” for which a commercial internal risk rating is not used or that uses a different scale than other corporate loans. Do not include graded loans, SME cards, corporate cards, non-purpose loans, or loans for purchasing and carrying securities.

## **Line item 2.c, SME cards and corporate cards**

Report SME card and corporate card loans included in FR Y-9C, Schedule HC-C, lines 4.a, 4.b, 6.a, 6.b, 6.d, and 9.b.(2). SME cards are credit card accounts where the loan is underwritten with the sole proprietor or primary business owner as an applicant. Corporate cards are employer-sponsored credit cards for use by a company’s employees. Only include cards where there is any individual liability associated with the sub-lines such that the individual borrower characteristics are taken into account during the underwriting decision and/or performance of the credit is reported to the credit bureaus. Do not include loans for which a commercially-graded corporation is ultimately responsible for repayment of credit losses (such loans should be reported as graded C&I loans or other commercial loans).

## **Line item 3.a, Bank cards**

Report bank card loans included in FR Y-9C, Schedule HC-C, line 6.a. Do not include SME card and corporate card loans.

## **Line item 3.b, Charge cards**

Report charge card loans to consumers included in FR Y-9C, Schedule HC-C, line 6.a and 6.d. Do not include SME card and corporate card loans or loans for which a commercially-graded corporation is ultimately responsible for repayment of credit losses.

## **Line item 4.a, Auto loans**

Report auto loans included in FR Y-9C, Schedule HC-C, line 6.c.

## **Line item 4.b, Student loans**

Report student loans included in FR Y-9C, Schedule HC-C, lines 6.b and 6.d.

## **Line item 4.c, Non-purpose lending**

Report non-purpose loans included in FR Y-9C, Schedule HC-C, lines 6.b and 6.d. Non-purpose loans are loans collateralized by securities made for any purpose other than purchasing or carrying securities.

## **Line item 4.d, Auto leases**

Report auto leases included in FR Y-9C, Schedule HC-C, line 10.a.

## **Line item 4.e, Other consumer loans**



# DRAFT

Report all other consumer loans included in FR Y-9C, Schedule HC-C, lines 6.b and 6.d that are not reported elsewhere on this schedule.

## **Line item 4.f, Other consumer leases**

Report all other consumer leases included in FR Y-9C, Schedule HC-C, line 10. that are not reported elsewhere on this schedule.

## **Line item 5.a, Loans to foreign governments**

Report graded loans to foreign governments included in FR Y-9C, Schedule HC-C, line 7. Also include non-purpose loans reported in line 7 of Schedule HC-C of the FR Y-9C regardless of whether those loans are graded. Do not include scored or delinquency managed loans reported as small business loans above.

## **Line item 5.b, Agricultural loans**

Report graded agricultural loans included in FR Y-9C, Schedule HC-C, line 3. Also include non-purpose loans reported in line 3 of Schedule HC-C of the FR Y-9C regardless of whether those loans are graded. Do not include scored or delinquency managed loans reported as small business loans above.

## **Line item 5.c, Securities lending**

Report all loans for purchasing or carrying securities included in FR Y-9C, Schedule HC-C, line 9.b.(1).

## **Line item 5.d, Loans to financial institutions**

Report graded loans to financial institutions included in FR Y-9C, Schedule HC-C, lines 2.a, 2.b, and 9.a. Also include non-purpose loans reported in lines 2.a, 2.b, and 9.a of Schedule HC-C of the FR Y-9C regardless of whether those loans are graded. Do not include scored or delinquency managed loans reported as small business loans above.

## **Line item 5.e, Other commercial loans**

Report other graded commercial loans included in FR Y-9C, Schedule HC-C, line 9.b.(2). Also include non-purpose loans reported in line 9.b.(2) of Schedule HC-C of the FR Y-9C regardless of whether those loans are graded. Do not include scored or delinquency managed loans reported as small business loans above, SME and corporate card loans reported as SME and corporate card loans, or charge cards reported as charge cards above.

## **Line item 5.f, Other commercial leases**

Report other graded commercial leases included in FR Y-9C, Schedule HC-C, line 10.b. Also include non-purpose loans reported in line 10.b of Schedule HC-C of the FR Y-9C regardless of whether those loans are graded. Do not include scored or delinquency managed loans reported as small business loans above.

## **Line item 6 Purchased credit card relationships and nonmortgage servicing assets**

Report the carrying amount of purchased credit card relationships (PCCRs) plus the carrying value of non mortgage servicing assets.

PCCRs represent the right to conduct ongoing credit card business dealings with the cardholders. In general, PCCRs are an amount paid in excess of the value of the purchased credit card receivables. Such relationships arise when a banking organization purchases existing credit card receivables and also has the right to provide credit card services to those customers. PCCRs may also be acquired when the reporting holding company acquires an entire depository institution.

Purchased credit card relationships shall be carried at amortized cost. Management of the institution shall review the carrying amount at least quarterly, adequately document this review, and adjust the carrying

# DRAFT

amount as necessary. This review should determine whether unanticipated acceleration or deceleration of cardholder payments, account attrition, changes in fees or finance charges, or other events or changes in circumstances indicate that the carrying amount of the purchased credit card relationships may not be recoverable. If this review indicates that the carrying amount may not be recoverable, the intangible asset should be tested for recoverability, and any impairment loss should be recognized.

The carrying value of nonmortgage servicing assets is the unamortized cost of acquiring contracts to service financial assets, other than loans secured by real estate (as defined for FR Y-9C, Schedule HC-C, item 1), that have been securitized by another party, net of any related valuation allowances. For further information, see the FR Y-9C Glossary entry for “servicing assets and liabilities.”

## Schedule M.2 - FR Y-9C Reconciliation

For the select portfolios from Schedule M.1 listed below, report the balance of loans included in the indicated line items on Schedule HC-C of the FR Y-9C. In column A report loans held for investment at amortized cost (HFI at AC). In column B report loans held for sale (HFS) or measured at fair value under a fair value option (FVO). Report all dollar amounts in millions.

The balances reported here should be consistent with the balances reported on Schedule M.1 for the corresponding portfolios. For example, the reported balance of small business loans held for investment at amortized cost (lines 1.a to 1.h, column A) should equal the balance of such loans reported on Schedule M.1 (line 2.b, column A + line 2.b, column C). A more comprehensive list of relationships between this schedule, Schedule M.1, and the FR Y-9C will be included with the technical instructions provided to all submitting institutions.

### 1. Small business loans

For each of the following line items under line 1, report the small business loans reported in line 2.b in Schedule M.1 that are included in the indicated line item on Schedule HC-C of the FR Y-9C:

**Line item 1.a** - Report loans included in FR Y-9C, Schedule HC-C, lines 2.a and 2.b.

**Line item 1.b** - Report loans included in FR Y-9C, Schedule HC-C, line 3.

**Line item 1.c** - Report loans included in FR Y-9C, Schedule HC-C, lines 4.a and 4.b.

**Line item 1.d** - Report loans included in FR Y-9C, Schedule HC-C, line 7.

**Line item 1.e** - Report loans included in FR Y-9C, Schedule HC-C, line 9.a.

**Line item 1.f** - Report loans included in FR Y-9C, Schedule HC-C, line 9.b.(2).

**Line item 1.g** - Report loans included in FR Y-9C, Schedule HC-C, line 10.b.

### 2. SME cards and corporate cards

# DRAFT

For each of the following line items under line 2, report the SME card and corporate card loans reported in line 2.c in Schedule M.1 that are included in the indicated line item on Schedule HC-C of the FR Y-9C:

**Line item 2.a** - Report loans included in FR Y-9C, Schedule HC-C, lines 4.a and 4.b.

**Line item 2.b** - Report loans included in FR Y-9C, Schedule HC-C, line 6.a.

**Line item 2.c** - Report loans included in FR Y-9C, Schedule HC-C, line 6.b.

**Line item 2.d** - Report loans included in FR Y-9C, Schedule HC-C, line 6.d.

**Line item 2.e** - Report loans included in FR Y-9C, Schedule HC-C, line 9.b.(2).

### 3. Charge cards

For each of the following line items under line 3, report the charge card loans reported in line 3.b in Schedule M.1 that are included in the indicated line item on Schedule HC-C of the FR Y-9C:

**Line item 3.a** - Report loans included in FR Y-9C, Schedule HC-C, line 6.a.

**Line item 3.b** - Report loans included in FR Y-9C, Schedule HC-C, line 6.d.

### 4. Student loans

For each of the following line items under line 4, report the student loans reported in line 4.b in Schedule M.1 that are included in the indicated line item on Schedule HC-C of the FR Y-9C:

**Line item 4.a** - Report loans included in FR Y-9C, Schedule HC-C, line 6.b.

**Line item 4.b** - Report loans included in FR Y-9C, Schedule HC-C, line 6.d.

### 5. Non-purpose consumer lending

For each of the following line items under line 5, report the non-purpose loans reported in line 4.c in Schedule M.1 that are included in the indicated line item on Schedule HC-C of the FR Y-9C:

**Line item 5.a** - Report loans included in FR Y-9C, Schedule HC-C, line 6.b.

**Line item 5.b** - Report loans included in FR Y-9C, Schedule HC-C, line 6.d.

## Schedule M.3 - Principal Balance of Retail Loans in Domestic Offices Held for Investment at Amortized Cost by Purchase Credit Impairment and Cumulative Interim Loan Losses

Part I

Book Value and UPB

For each line item listed below, report the book value and unpaid principal balance (UPB) of all retail loans and leases held for investment at amortized cost (HFI at AC) in domestic offices by purchase credit impairment status. Do not include loans held for sale or loans measured at fair value under a fair value option. Do not include loans held in international offices. Institutions that have not adopted ASU 2016-13 should continue to report balances in columns A, B, C, and D. In column A report the book value of non-purchase credit impaired (non-PCI) loans. In column B report the UPB of non-PCI loans. In column C report the book value of purchased credit impaired (PCI) loans. In column D report the UPB of PCI loans. Institutions that have adopted ASU 2016-13 should report in column A the book value of non-purchased credit-deteriorated (non-PCD) loans. In column B report the UPB of non-PCD loans. In column C report the book value of PCD loans. In column D report the UPB of PCD loans. Report all dollar amounts in millions.

For the purposes of this schedule, the book value of a loan held for investment at amortized cost is the

# DRAFT

original cost of the loan less any write-downs associated with depreciation, amortization, or impairment costs. The UPB of the loan is the total principal amount outstanding as of the end of the reporting period and should not reflect any accounting based write-downs or purchased credit impairments or deterioration.

The book value reported here should be consistent with the balances reported on Schedule M.1 for the corresponding portfolios. For example, the book value of first mortgages held for investment at amortized cost in domestic offices (line 1.a.(1).(a), column A + line 1.a.(1).(a), column C) should equal the balance of such loans reported on Schedule M.1 (line 1.a.(1).(a), column A). A more comprehensive list of relationships between this schedule and Schedule M.1 will be included with the technical instructions provided to all submitting institutions.

## **1.a.(1).(a), First mortgages**

Report first mortgage loans that are reported in line 1.a.(1).(a) in Schedule M.1.

## **1.a.(1).(b), First lien HELOANS**

Report first lien closed-end home equity loans (HELOANS) that are reported in line 1.a.(1).(b) in Schedule M.1.

## **1.a.(2).(a), Junior lien HELOANS**

Report junior lien closed-end home equity loans (HELOANS) that are reported in line 1.a.(2).(a) in Schedule M.1.

## **1.a.(2).(b), HELOCs**

Report home equity lines of credit (HELOCs) that are reported in line 1.a.(2).(b) in Schedule M.1.

## **2.a., Bank cards**

Report bank card loans that are reported in line 3.a in Schedule M.1.

## **2.b., Charge cards**

Report charge card loans that are reported in line 3.b in Schedule M.1.

## **3.a., Auto loans**

Report auto loans that are reported in line 4.a in Schedule M.1.

## **3.b., All other consumer loans and leases**

Report all other consumer loans and leases that are reported in lines 4.b, 4.c, 4.d, 4.e, and 4.f in Schedule M.1.

## Part II

### Cumulative Interim Loan Losses

Cumulative interim loan losses on Part II of this schedule should be reported based on the loan's classification on the FR Y-9C, Schedule HC-C (i.e., based on the loan's collateral, counterparty, or purpose). Refer to the FR Y-9C instructions for Schedule HC-C for guidance on loan classification. For the items below, 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.

# DRAFT

For each item below, report cumulative interim loan losses. Firms that have not adopted ASU 2016-13 should report only cumulative interim loan losses for PCI and non-PCI loans in items a. and b. for each mortgage type. Firms that have adopted ASU 2016-13 should only report cumulative interim loan losses on PCD and non-PCD loans in item c. for each mortgage type. Cumulative interim loan losses on loans held for sale and loans held for investment under the fair value option should not be included.

Use the following definitions:

## Retail Loan Categories

### 1. First Lien Mortgages (in Domestic Offices)

The loan population includes all domestic first lien mortgage loans directly held on the BHC's or IHC's portfolio. Portfolio loans are all loans as defined in the FR Y-9C, Schedule HC-C, item 1.c.2.(a).

### 2. First Lien HELOANs (in Domestic Offices)

The Loan population includes all domestic first lien home equity loans directly held on the BHC's or IHC's portfolio. Portfolio loans are all loans as defined in the FR Y-9C, Schedule HC-C, item 1.c.(2)(a).

### 3. Closed-End Junior Liens (in Domestic Offices)

The loan population includes all domestic loans directly held on the BHC's or IHC's portfolio. Portfolio loans are all loans as defined in the FR Y-9C, Schedule HC- C, item 1.c.(2)(b).

### 4. HELOCs (in Domestic Offices)

The loan population includes all first and junior lien domestic lines directly held on the BHC's or IHC's portfolio. Portfolio lines are all loans as defined in the FR Y-9C, Schedule HC-C, item 1.c.(1).

### 5. First Lien Mortgages and HELOANs (International)

The loan population includes all non-domestic loans directly held on the BHC's or IHC's portfolio. Portfolio loans are all loans as defined in the FR Y-9C, Schedule HC-C, item 1.c.(2)(a).

### 6. 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 or IHC'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).

## Cumulative Interim Loan Losses

### a. Cumulative Interim Loan Losses – Non-PCI<sup>44</sup>

Report the total unpaid principal balance that has been charged-off on loans in the segment through quarter-end of the reporting period on non-PCI loans. Interim charge-offs include all cumulative partial charge-offs/write-downs for loan that have not been fully charged-off or otherwise liquidated.

### b. Cumulative Interim Loan Losses – PCI

Report the total interim losses through quarter-end of the reporting period that have been or are expected to be covered by the non-accretable mark or the reserve set up post-mark (ALLL) to cover additional shortfalls in expected cash flows on PCI loans. This measure should not include liquidated loans.

---

<sup>44</sup> Items a. and b. will be eliminated upon full adoption of ASU 2016-13 and subsequent items will be renumbered.

# DRAFT

For more information on purchased credit-impaired loans, refer to the FR Y-9C, Schedule HC-N, Memorandum item 9.

**c. Cumulative Interim Loan Losses<sup>45</sup>**

Report the total unpaid principal balance that has been charged off on loans in the segment through quarter-end of the reporting period. Interim charge-offs include all cumulative partial charge-offs or write-downs for a loan that have not been fully charged-off or otherwise liquidated. Report this item for both PCD and non-PCD loans.

---

<sup>45</sup> Item c. should only be reported by institutions that have adopted ASU 2016-13.

**DRAFT**

# DRAFT

## Appendix A: FR Y-14Q Supporting Documentation

### Supporting Documentation for Schedule C – Regulatory Capital Instruments

#### **Additional Information required for capital instrument issued (Tied to C. 3: Regulatory Capital Instruments Issuances During Quarter)**

For all capital instruments except for common stock that were issued during the quarter, include as a separate attachment to the schedule submission the prospectus supplement, certificate of designation, or the indenture for the instrument.

### Supporting Documentation for Schedule D – Regulatory Capital

#### **Additional Information Required for Each Planned Action (Tied to D.6)**

In addition to the information provided within the Planned Action worksheet, BHCs and IHCs are also required to submit additional information related to the actual progress made on its planned actions through the report date.

At a minimum, the document should address the following:

- The status of the action during the reporting quarter, and how it compares to the BHC's or IHC's projection for the planned action to date. This should state whether the BHC or IHC is on-track in terms of meeting its planned action strategy relative to the impact it projected for the corresponding action in its most recent FR Y-14A Regulatory Capital schedule submission, and/or how it has deviated from the strategy and the rationale behind the changes.
- The supplemental document should also describe in detail any new actions the BHC or IHC has taken, which was not part of its proposed planned actions as submitted per the FR Y-14A Regulatory Capital schedule.

This quarterly information related to each planned action must be provided in a separate attachment and should be titled: **BHCRSSD\_BHCMNEMONIC\_REGCAPTRANS\_QTRLYUPDATE\_ACTION#\_YYMMDD**. Note that the “#” in this file name must correspond with the appropriate “Action #” in column A of the Planned Actions Worksheet of the most recent FR Y-14A submission.

### Supporting Documentation for Schedule L – Counterparty

The supporting document should be titled **BHCRSSD\_BHCMNEMONIC\_CCR\_METHODODOLOGY\_YYMMDD**. BHCs and IHCs should submit separate documents for different models and/or methodologies. The documents should be titled: **BHCRSSD\_BHCMNEMONIC\_CCR\_METHODODOLOGY\_MODELTYPE\_YYMMDD**. Model Type refers to Trading Issuer Default, CVA and Counterparty Default Losses. These instructions are also provided in the FR Y-14A instructions.

The documentation should include a detailed description of the methodologies used to estimate Trading Issuer Default, CVA, and Counterparty Default losses under the stress scenarios reported on the FR Y-14A Summary schedule as well as methodologies used to produce the data in the FR Y-14Q CCR schedule (**only for the CCAR as of quarter**). All information relevant for supervisors to understand the approach should be included, and it should be transparent in the documentation where to find the response to each item. Any differences between the BHC or IHC and the FR scenarios in methodology, position capture, or other material elements of the loss modeling approach should be clearly described. It is expected that for some BHCs or IHCs, there will be BHC or IHC-specific or other material methodological items in addition to those specifically listed in the instructions. These additional items should be included in the documentation as



# DRAFT

well.

As part of the detailed methodology document, BHCs and IHCs should provide an Executive Summary that gives an overview of each model and answers each of the questions below. If one of the questions below is not fully addressed in the Executive Summary, cite the document name and page number(s) of the methodology document that fully addresses the question.

In addition to the Executive Summary, there should be a section of the methodology document devoted to any divergence from the instructions to the Counterparty Risk sub-schedule or the FR\_Y-14A Schedule. Use this section to explain any data that is missing or not provided as requested. This section should also be used to describe where and how judgment was used to interpret an instruction.

Supporting documentation for a given model should be submitted at the same time as the loss estimates derived from that model. For example, Trading IDR supporting documentation should be submitted along with FR Y-14Q Schedule F and CVA and Default Loss supporting documentation should be submitted along with FR Y-14Q Schedule L.

## **Trading Issuer Default Losses (Trading IDL)**

### **1. Data and systems**

- a. What product types are included and excluded? Specifically, comment on whether equities are excluded and what types of securitized products, if any, are excluded. Comment on the materiality of any exclusions.
- b. Are there any issuer type exclusions? Comment on the materiality of any exclusions.
- c. Are there any exposure measurement or trade capture limitations impacting the Trading IDL estimate in Item 1 on the Counterparty Risk sub-schedule in the SUMMARY\_SCHEDULE or the data provided in sub-schedules Corporate Credit-Advanced, Corporate Credit-EM, Sovereign Credit, Credit Correlation, IDR-Corporate Credit, or IDR-Jump To Default in the FR\_Y-14Q\_TRADING Schedule? If so, please elaborate in the documentation, particularly where these limitations understate losses.
- d. Are there any discrepancies in position capture between the MV and Notionals reported in sub-schedules Corporate Credit-Advanced, Corporate Credit-EM, Sovereign Credit, Credit Correlation, or IDR- Corporate Credit in the FR\_Y-14Q\_TRADING Schedule? If so, please elaborate on the discrepancies in the documentation.
- e. Are any index or structured exposures decomposed/unbundled into single name exposures on the IDR Corp Credit or IDR Jump to Default sub-schedules in the FR\_Y-14Q\_TRADING Schedule? If so, provide a description of the exposures that are decomposed and the methodology used.
- f. What types of CVA hedges are included in the FR\_Y-14Q\_TRADING Schedule and Item 10 on the Trading sub-schedule of the SUMMARY\_SCHEDULE (e.g., market risk hedges, counterparty risk hedges)? Which, if any, of these hedges are excluded from the Trading IDR loss estimates (Item 1 on the Counterparty Risk sub-schedule of the SUMMARY\_SCHEDULE)? Confirm that hedges modeled in Trading IDR are excluded from CCR IDR.

### **2. PD methodology**

- a. How is the severity of default risk treated? Is a stressed expected PD used, or is it an outcome in the tail of the default distribution? If an outcome in the tail is used, what is the tail percentile?
- b. How is default risk represented over the horizon of the stress test? Is a cumulative two- year PD or a one-year PD used as a model input? How is migration risk captured?
- c. What data sources and related time periods are used to generate the assumptions on stressed expected PD or the default distribution? In the documentation, provide a breakdown of PDs (e.g., by

# DRAFT

rating, asset category). Provide stressed PDs if a stressed PD is used, or provide PD inputs if an outcome in the tail is used.

## 3. Correlation assumptions

- a. What correlation assumptions are used in the Trading IDL models?

## 4. LGD methodology

- a. Do the models assume a static LGD or a stochastic LGD with a non-zero recovery rate volatility?
  - i. If a static LGD is used, were the mean LGDs stressed? What data sources and related time periods were used to determine the LGDs? In the methodology documentation, provide the relevant breakdown of LGDs used in the model (e.g., by ratings, asset category).
  - ii. If a stochastic LGD is used, elaborate on the assumptions generating the stochastic LGD in the documentation, including assumptions on the LGD mean and volatility and rationale for modeling choices.

## 5. Liquidity horizon

- a. What liquidity horizon assumptions are used?

## 6. Exposure at default (EAD)

- a. What Exposure at Default (EAD) is used for Trading IDL? For example, is the calculation based on actual issuer exposures, stressed exposures, a mix of both, or something else? If exposures are stressed, please explain how the exposures were stressed.

## 7. Treatment of gains

- a. Are any gains being reflected in the Trading IDL calculations? If so, elaborate in the documentation how gains are treated.

## 8. Model validation and documentation

- a. For any models used to report numbers in the SUMMARY\_SCHEDULE or the FR\_Y-14Q\_Trading that are also used in Business as Usual (BAU) production, have those models been validated as used in BAU? If so, attach model validation documents. If not, elaborate in the documentation on any review process.
- b. For any ad-hoc models used for CCAR that would not have been previously validated, what review if any has occurred? Elaborate in the documentation where appropriate.

## CVA Losses

### 1. Divergence from instructions

- a. In the FR\_Y-14Q\_CCR or Summary Schedules, is bilateral CVA included in any element of the submission (i.e., CVA where the counterparty default probabilities are conditional on the survival of the BHC or IHC)? If so, elaborate in the documentation.
- b. Are CVA hedges considered or included in any aspect of the firm's CVA loss reporting or CVA

# DRAFT

calculations? If so, please provide detail and document where CVA data are reported net of hedges on the FR\_Y\_14Q\_CCR Schedule or Item 2 on the Counterparty Risk sub-schedule in the SUMMARY\_SCHEDULE.

- c. In calculating Stressed Net CE in sub-schedules 1a, 1b, 1c, 1d, and 1e in FR\_Y-14Q\_CCR, are there any occasions where it is assumed additional collateral has been collected after the shock? If so, elaborate in the documentation.
- d. Are there any counterparties for which your firm did not fully implement the FR specification for the EE profiles on sub-schedule 2 in the FR\_Y-14Q\_CCR? If so, elaborate in the documentation.
- e. Are there any counterparties for which your firm substituted 'Country of Risk' for 'Country of Domicile' in the FR\_Y-14Q\_CCR? If so, elaborate in the documentation.

## 2. Data and systems

In the documentation, clearly identify, describe, and comment on the materiality (in both exposure and CVA loss terms) of any exclusions that prevent 100% capture of counterparties or trades. At a minimum, address the questions below and elaborate in the documentation where appropriate.

- a. As firms are required to report only counterparties comprising 95% of CVA on sub-schedule 1a of FR\_Y-14Q\_CCR, please provide detailed information on the composition of counterparties comprising the remaining 5%, including any relevant industry concentrations or counterparties with significant default risk.
- b. Are any counterparties on sub-schedule 1a of FR\_Y-14Q\_CCR excluded from sub-schedule 2? Where specific counterparties are reported as Top counterparties by 95% of Total CVA on one sub-schedule of the Schedule, but are not listed on other sub-schedules, list these counterparties in the documentation by name and provide a reason for their exclusion.
- c. Are any counterparties excluded from the unstressed or stressed aggregate data reported in sub-schedules 1e, 2, or 3 of FR\_Y-14Q\_CCR or the losses reported in the SUMMARY\_SCHEDULE SUMMARY\_SCHEDULE (Item 2 in the Counterparty Risk sub-schedule)? In the documentation, elaborate on the nature, materiality, and rationale for these exclusions.
- d. Please ensure that the methodology documentation includes a description of how stressed or unstressed discount factors are included in the CVA calculation.
- e. Do the expected exposure (EE) profiles, CDS spreads, PDs, LGDs, discount factors, as provided on sub-schedule 2, come from the same systems as those used for the calculation of CVA losses as provided in the SUMMARY\_SCHEDULE (Item 2 in the Counterparty Risk sub-schedule)? If not, elaborate in the documentation.
- f. For unstressed and stressed CVA reported in the FR\_Y-14Q\_CCR Schedule, which counterparties, counterparty types, or trade types are calculated offline or using separate methodologies? Why are they calculated offline or with a different methodology? Elaborate in the documentation.
- g. Are any add-ons used to calculate stressed CVA in the FR\_Y-14Q\_CCR Schedule? Elaborate regarding the nature and rationale for each type of add-on in the documentation.
- h. Are there any additional/ offline CVA reserves reported in sub-schedule 1e in the FR\_Y-14Q\_CCR Schedule? If so, elaborate about the nature of these reserves in the documentation. Explain what counterparties, counterparty types, or trade types are included, why are they calculated as reserves, and how they are stressed.
- i. Are there any exposure measurement or product capture limitations impacting the loss estimate in Item 2 on the Counterparty Risk sub-schedule in the SUMMARY\_SCHEDULE? If so, make sure to elaborate in the documentation, particularly where these limitations understate losses.
- j. Does the firm conduct a reconciliation between the sum of items 15(a) in Schedule HC-L of the FRY-9C and the aggregate unstressed Gross CE on sub-schedule 1e of the FRY-14Q\_CCR Schedule? Note that the figures in the FRY-9C are called "net current credit exposure", as the "net" refers to counterparty netting.

# DRAFT

- k. Are all sensitivities/ slides provided as requested? If slides are not provided as requested in the FR\_Y-14Q\_CCR Schedule, elaborate in the documentation why they are missing or not provided correctly.
- l. Are the sensitivities/ slides provided in sub-schedule 4 of FR\_Y-14Q\_CCR sourced from the same calculation engine and systems as used for the firm's loss estimates (Item 2 in the Counterparty Risk sub-schedule in the SUMMARY\_SCHEDULE)? If not, elaborate in the documentation.
- m. Elaborate on how sensitivities/ slides in sub-schedule 4 of FR\_Y-14Q\_CCR were determined to be material. What qualifies a risk factor as immaterial?

### 3. LGD methodology

- a. For the LGD used to calculate PD, are market implied recovery rates used? If not, elaborate on the source of the LGD assumption in the methodology documentation.
- b. Is the same recovery/LGD used in the CVA calculation as is used to calculate PDs from the CDS spread? If not, in the documentation provide a detailed rationale and backup data to support the use of a different LGD, and provide the source of the LGD used to calculate CVA.

### 4. Exposure at default (EAD)

- a. What Margin Period of Risk (MPOR) assumptions are used for unstressed and stressed CVA?
- b. Are collateral values stressed in the numbers reported in the FR\_Y\_14Q\_CCR Schedule or Items 2 or 3 on the Counterparty Risk sub-schedule in the SUMMARY\_SCHEDULE? If so, elaborate on the stress assumptions applied.
- c. In the FR\_Y-14Q\_CCR sub-schedule 2, for the BHC or IHC specification, are downgrade triggers modeled in the exposure profiles?

### 5. Application of shocks

- a. Are the shocks applied to CVA (for calculating Item 2 in the Counterparty Risk sub-schedule in the SUMMARY\_SCHEDULE as well as the Stressed figures reported in FR\_Y-14Q\_CCR) the same as those applied to the Trading Book (Item 10 in the Trading sub-schedule in the SUMMARY\_SCHEDULE)? Where they differ, or where shocks applied diverge from the FR shock scenario, elaborate in the documentation.

### 6. Model validation and documentation

- a. For any models used to report numbers in the SUMMARY\_SCHEDULE or the FR\_Y-14Q\_CCR that are also used in Business as Usual (BAU) production, have those models been validated as used in BAU? If so, attach model validation documents. If not, elaborate in the documentation on any review process.
- c. For any ad-hoc models used for CCAR that would not have been previously validated, what review if any has occurred? Elaborate in the documentation where appropriate.

## Counterparty Default Losses (CDL)

### 1. Data and systems

- a. Are there any exposure capture or measurement limitations related to counterparties, products or trades impacting the loss estimate in Item 3 on the Counterparty Risk sub-schedule in the SUMMARY\_SCHEDULE? If so, please elaborate in the documentation, particularly where these limitations understate losses.

# DRAFT

- b. What types of CVA hedges are included in CDL? Confirm that hedges modeled were excluded from Trading IDL.

## 2. PD methodology (if applicable)

- a. How is the severity of default risk treated? Is a stressed expected PD used, or is it an outcome in the tail of the default distribution? If an outcome in the tail is used, what is the tail percentile?
- b. How is default risk represented over the horizon of the stress test? Is a cumulative two- year PD or a one-year PD used as a model input? How is migration risk captured?
- c. What data sources and related time periods are used to generate the assumptions on stressed expected PD or the default distribution? In the documentation, provide a breakdown of PDs (e.g., by rating, counterparty type). Provide stressed PDs if a stressed PD is used, or provide PD inputs if an outcome in the tail is used.

## 3. Correlation assumptions (if applicable)

- a. What if any correlation assumptions are used calculating Default Losses?

## 4. LGD methodology (if applicable)

- a. Do the models assume a static LGD or a stochastic LGD with a non-zero recovery rate volatility?
- b. If a static LGD is used, are the mean LGDs stressed? What data sources and related time periods are used to determine the LGDs? In the methodology documentation, provide the relevant breakdown of LGDs used in the model (e.g., by ratings, counterparty type).
- c. If a stochastic LGD is used, elaborate on the assumptions generating the stochastic LGD in the documentation, including assumptions on the LGD mean and volatility and rationale for modeling choices.

## 5. Liquidity horizon (if applicable)

- a. What liquidity horizon assumptions are used?

## 6. Exposure at default (EAD) (if applicable)

- a. Provide an overview of how EAD is modeled for Default Losses?
- b. Are any downgrade triggers assumed in the Default Loss model? If so, elaborate in the documentation.
- c. What Margin Period of Risk (MPOR) assumptions are modeled in Default Losses?

## 7. Treatment of gains (if applicable)

- a. Are any gains being reflected in the Default Losses calculations? If so, elaborate in the documentation how gains are treated.

## 8. Model validation and documentation

- a. For any models used to report numbers in the SUMMARY\_SCHEDULE or the FR\_Y-14Q\_CCR that are also used in Business as Usual (BAU) production, have those models been validated as used in BAU? If so, attach model validation documents. If not, elaborate in the documentation on any review process.
- b. For any ad-hoc models used for CCAR that would not have been previously validated, what review if any has occurred? Elaborate in the documentation where appropriate.

# DRAFT

## 9. Other

As the firm considers any additional firm-wide losses beyond OTC derivative and SFT transaction losses that could result from the default or potential default of a counterparty or counterparties, please detail and document those losses.

### **Supplemental Data Collection**

Please provide a detailed description of the data provided in each table of the supplemental data collection schedule.