

January 30, 2015

Mr. Robert deV. Frierson
Secretary
Board of Governors of the Federal Reserve System
20th Street & Constitution Avenue, N.W.
Washington, D.C. 20551

RE: Proposed Revisions to the FR 2052a and FR 2052b Reports – OMB control number 7100-0361

Dear Mr. Frierson:

Wells Fargo & Company appreciates the opportunity to comment on the proposed revisions to the FR 2052a and FR 2052b reports (the “FR 2052 Reports”) that the Board of Governors of the Federal Reserve System published in The Federal Register on December 2, 2014 (79 Fed. Reg. 71,416). We support the use of the FR 2052 Reports to monitor the overall liquidity profile of institutions supervised by the Federal Reserve, in alignment with the recently finalized liquidity coverage ratio (LCR) rule. We join in the positions outlined in detail in the joint comment letter regarding the FR 2052 Reports from The Clearing House, the Institute of International Bankers, and the American Bankers Association (together, the “Associations”). We would, however, like to emphasize the following concern.

The notice of the proposed changes to the FR 2052 Reports includes at 79 Fed. Reg. 71,419, the question “Should a description of how the FR 2052a data will be used to monitor LCR compliance be published?” We believe it is very important that such a description be published as soon as possible to ensure there is no risk of misunderstanding of the FR 2052a data. Such misunderstanding would lead to an obviously undesirable disconnect in the assessment of an institution’s daily LCR position between the institution and the Federal Reserve. The most straightforward way to avoid such potential misunderstanding would be for the Federal Reserve to publish a template that calculates the LCR using the underlying FR 2052a data. Such a template should establish a direct link between the two that will populate automatically utilizing data provided in the FR 2052a and avoid the possibility that the institution and the Federal Reserve calculate different daily LCR position results.



We appreciate the opportunity to provide our comments and concerns regarding the FR 2052 Reports. We welcome the opportunity for further discussions. If you have any questions, please contact me at 415-396-5196.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul R. Ackerman". The signature is fluid and cursive, with the first name "Paul" being the most prominent.

Paul R. Ackerman
Executive Vice President and Treasurer
Wells Fargo & Company