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Via Electronic Mail

Robert de V. Frierson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
regs.comments@federalreserve.gov
Agency form numbers: FR 2052a and FR 2052b
OMB control number: 7100-0361

Re: Proposed Agency Information Collection Activities – Extension and Revision of the Complex Institution Monitoring Report (FR 2052a) and Liquidity Monitoring Report (FR 2052b)

Ladies and Gentlemen:

Ally Financial Inc. ("Ally") appreciates the opportunity to provide comment to the proposed extension and revision of the Complex Institution Liquidity Monitoring Report (FR 2052a) and Liquidity Monitoring Report (FR 2052b) (collectively, the "Proposal").[1]

Ally is a leading automotive financial services company powered by a top direct banking franchise. With approximately $151.8 billion in total consolidated assets as of December 31, 2014 and limited foreign exposures, Ally expects to be subject to the modified liquidity coverage ratio requirement ("Modified LCR") adopted by the Board of Governors of the Federal Reserve System ("Board") in the final Liquidity Coverage Ratio rule.[2]

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[1] Proposed Agency Information Collection Activities; Comment Request, 79 Fed. Reg. 71,416 (Dec. 2, 2014).

[2] Liquidity Coverage Ratio: Liquidity Risk Measurement Standards; Final Rule, 79 Fed. Reg. 61,440 (Oct. 10, 2014).

We agree that prudent liquidity risk management is of critical importance to each financial institution as well as the overall resiliency of the financial system. As such, Ally dedicates substantial people, systems and processes to the development and maintenance of a robust liquidity risk management framework including liquidity risk metrics, stress testing, contingency funding plans and sound corporate governance. Significant resources beyond these efforts are required to implement new liquidity risk reporting and processes required by the regulatory agencies. Examples of important 2014 regulatory related efforts include resources allocated to implement the Modified LCR, the Liquidity Monitoring Report (2052b), the Enhanced Prudential Standards of Section 165 of the Dodd-Frank Act, and resolution planning. Because the liquidity reporting and processes required to comply with these new standards are very prescriptive and constructed to apply consistently across a wide variety of financial institutions, the specific data needs can be different from the data used in our internal liquidity risk metrics. For example, the Modified LCR and FR 2052b report are based on contractual cash flows such as the required customer payment, while internal liquidity risk metrics are based on expected cash flows, including the impact of prepayments. Data and reporting differences between internal risk metrics and regulatory required reporting have forced us to develop separate packages of systems, processes and reports.

In our opinion, Ally and financial institutions of similar size, structure and complexity do not present significant risk to the financial system. As mentioned earlier, Ally is a financial services company focused on providing financial products to the automotive market sector. Our business model is simple, straight forward and domestically focused. We firmly believe that less complex, domestically focused financial institutions should not be held to the same reporting standards as larger and much more complex financial institutions. We appreciate the Board's recognition of non-systemic, less complex financial institutions, particularly as it relates to the implementation of the Modified LCR rules, and ask for similar consideration with respect to the Proposal.

The revisions required by the Proposal place a material incremental burden on Ally and other Modified LCR bank holding companies. Most significantly, the data, systems and processes developed by Ally to support both the FR 2052b reporting and Modified LCR calculations extract data based on a monthly bucketing of cash flows. The proposed FR 2052a report materially expands the required time period bucketing to include 60 days of daily contractual cash flows and 4 periods of weekly contractual cash flows. The daily and weekly bucketing requirement differs from Ally's existing FR 2052b and LCR data, systems and processes, and will require fundamental changes to projects that have already been implemented. In addition, given the volume and nature of the proposed changes, there is insufficient time to create the necessary systems and processes to support the proposed FR 2052a reporting particularly since, as of late January, a draft FR 2052a reporting form has not been provided. Due to these factors, it would be extraordinarily difficult for Ally to be ready for implementation in January 2016.

We ask the Board to consider an appropriate balance between the burdens associated with gathering and reporting information, and the tangible benefits to the financial system provided by that information. We believe this balance can be achieved by maintaining the existing FR 2052b report for bank holding companies subject to the Modified LCR requirements.

Ally thanks the Board for the opportunity to comment on the proposed changes to the FR 2052a and FR 2052b. In Summary, Ally dedicates significant resources to both internal as well as regulatory required liquidity risk management, does not present significant risk to the financial system, and the proposed revisions to the FR 2052a place significant incremental reporting burdens on Ally and other Modified LCR bank holding companies.

We respectfully ask the Board to consider our recommendation that bank holding companies subject to the Modified LCR:

- **Continue reporting on the existing FR 2052b; or**
- **The proposed FR 2052a eliminate the daily and weekly time buckets to be consistent with the current FR 2052b time buckets;**
- **In either case, the due date be the 15th calendar day following the "as of" date; and**
- **Implementation be delayed until one year following adoption of the final rule**

If you have any questions regarding the content of this letter or would like more information on the same, please do not hesitate to contact me at (704) 444-4805, or Tom Dunn, our head of Liquidity Risk Management, at (704) 444-4453.

Sincerely,

Bradley J. Brown
Corporate Treasurer

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