

From: Financial Services Roundtable, Financial Services Roundtable, Richard Foster

Proposal:

Subject: FR Y14A/Q/M

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Comments:

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[p]Public Comments on Agency Information Collection Activities; Proposals, Submissions, and Approvals:=====[/p]

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[p]Submitter Info:

First Name: Richard

Last Name: Foster

Mailing Address: 600 13th Street NW Suite 400

City: Washington

Country: United States

State or Province: DC

ZIP/Postal Code: 20005

Email Address: [a href="mailto:richard.foster@fsroundtable.org"]richard.foster@fsroundtable.org[/a]

Organization Name: Financial Services Roundtable

Comment: Attached is a copy of The Financial Services Roundtable's comment letter on changes to the FR Y-14A/Q/M reporting schedules proposed by the Board of Governors of The Federal Reserve System. [/p]

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# FINANCIAL SERVICES ROUNDTABLE

November 16, 2015

Robert deV. Frierson  
Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20051

Re: FR Y-14A/Q/M

Dear Mr. Frierson:

The Financial Services Roundtable (“FSR”)<sup>1</sup> appreciates the opportunity to submit these comments on the changes to the FR Y-14A/Q/M reporting schedules proposed by the Board of Governors of the Federal Reserve System (the “Board”) in the notice published in the Federal Register on September 16, 2015 (the “Notice”).<sup>2</sup> FSR’s members include 21 of the 33 bank holding companies that file FR Y-14 reports, and, as such, FSR members are intimately involved in this information collection process.

For the past three years, FSR members have engaged in a productive dialogue with Board and Reserve Bank staff regarding the FR Y-14 reports. That dialogue is an outgrowth of a 2012 meeting between members of the FSR and then Federal Reserve Board Governor Elizabeth Duke. Governor Duke encouraged greater industry engagement on what was then a new set of reporting requirements. FSR members were eager to participate in such an effort because we understand that accurate, high integrity data is central to the Board’s Comprehensive Capital Analysis and Review (CCAR) and the Dodd-Frank stress testing (DFAST) cycles.<sup>3</sup>

From the beginning of this two-way dialogue, the members of the FSR’s working group on FR Y-14 have had a single, continuing goal: *“to enhance the quality and integrity of*

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<sup>1</sup> As *advocates for a strong financial future*<sup>TM</sup>, FSR represents 100 integrated financial services companies providing banking, insurance, and investment products and services to the American consumer. Member companies participate through the Chief Executive Officer and other senior executives nominated by the CEO. FSR member companies provide fuel for America’s economic engine, accounting directly for \$98.4 trillion in managed assets, \$1.1 trillion in revenue, and 2.4 million jobs.

<sup>2</sup> Federal Reserve System, Proposed Agency Information Collection Activities, Comment Request, 80 Fed Reg. 55621, Sept. 16, 2015.

<sup>3</sup> FSR staff met with Board staff on November 1, 2012 to establish a framework for this dialogue. A summary of that meeting may be found at: [http://www.federalreserve.gov/newsevents/rr-commpublic/Cat\\_1b\\_-\\_FSR\\_data\\_meeting\\_\(110112\).pdf](http://www.federalreserve.gov/newsevents/rr-commpublic/Cat_1b_-_FSR_data_meeting_(110112).pdf)



*risk reporting data submitted to the Federal Reserve and meet the evolving data needs in a responsive, efficient, and risk-sensitive way.”<sup>4</sup>*

As the Board understands, the collection, analysis, validation, and reporting of accurate risk reporting data is an ongoing, iterative, and evolving process among finance and treasury groups, risk management, and information technology groups at reporting banks as well as the Board. Therefore, in our view, continuing to enhance the current process by working collaboratively through constructive and regular engagement on these issues of mutual concern will yield benefits to both the Board, the Reserve Banks, and reporting companies.

Since our initial meeting with Governor Duke, FSR members have held semi-annual meetings with Board and Reserve Bank staff to discuss the data collection and submission process. These day-long sessions have enabled industry representatives and Board and Reserve Bank staff to discuss the mechanics of the FR Y-14 data collection, and to collectively pursue actions designed to improve the process and the quality of the data submitted to the Board. We also have held several conference calls on issues raised by the Board staff. This dialogue has resulted in several improvements to the FR Y-14 process. We look forward to continued engagement with Board and Reserve Bank staff on ways to improve this data collection.

It is apparent, however, that both the Board and FSR members share a continuing concern about the quality of the data submitted in connection with this reporting requirement. In the Notice, the Board expresses concern over “material inaccuracies” in reported information at some banks, and proposes an attestation requirement to address this concern. Conversely, in our meetings with Board and Reserve Bank staff, as well as our prior comment letters to the Board, we repeatedly have expressed concern over the negative effects that frequent changes in the schedules and insufficient implementation periods have on the quality of the data reported.

We have a common interest in ensuring that the data submitted is accurate and usable. If the Board wants to reduce material inaccuracies immediately, then we recommend that the Board take two important actions to improve both the integrity of the data and the overall reporting process: (1) reduce the frequency of changes to the FR Y-14 schedules; and (2) establish a minimum six-month implementation period following the finalization of reporting *and* technical changes.<sup>5</sup> We firmly believe that adoption of these simple, actionable recommendations would enable FSR members and other reporting companies to submit better and more accurate data going forward.

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<sup>4</sup> *Continuing the FR Y-14 Data Dialogue*, Discussion Draft, FSR, Washington, DC, October 23, 2015; This document appears as Attachment A.

<sup>5</sup> As discussed further below, this recommendation applies to the addition of new data fields and modifications to existing data fields. We do not object to the immediate removal of existing data fields. It is a much easier process for reporting companies to eliminate data fields than to add or modify data fields.

The balance of this letter is divided into six sections. Section I expands on our recommendations regarding the timing of changes and compliance with those changes. Section II lists several other recommendations for the current data collection that would further improve the quality, utility and clarity of the data. Section III provides specific comments on the changes proposed in this Notice. Section IV addresses the Board's proposed attestation requirement for the largest of the respondent bank holding companies. Section V addresses the reporting burden associated with these schedules and provides data collected from FSR members. Finally, Section VI discusses the Board's proposal to share the data from the FR Y-14 schedules with the Office of Financial Research (OFR).

## **I. THE FREQUENCY AND IMPLEMENTATION OF CHANGES**

While our dialogue with Board and Reserve Bank staff has been constructive and resulted in improvements in the FR Y-14 data collection, more fundamental changes are needed to enhance the quality, utility, and clarity of the data. The changes that would materially improve the FR Y-14 data collection are: (1) less frequent changes to schedules, and (2) the establishment of a minimum six-month implementation period following the finalization of reporting and technical requirements. We also recommend that the Board prioritize the data requested in the FR Y-14 data schedules.

### **A. The Board should reduce the frequency of changes to the schedules.**

Since the inception of this process, the Board has made regular changes to the schedules. Each change, no matter how minor, adds to the reporting burden of respondents. Each change requires a respondent to manually modify data collection procedures or recode systems. More importantly, frequent changes impair the quality of the data and prevent the maturation of this reporting requirement.

In 2012, for example, the Board revised the FR Y-14 schedules four times. Multiple changes also were made in 2013 and 2014. It is a challenging task for FSR members to continually develop new processes to meet these changing requirements. Continual changes to the data requested, especially when reporting companies are given little time to implement the changes, increase the risk of errors. We strongly urge the Board to reduce the frequency of changes to the schedules. Less frequent changes will reduce the potential for errors and improve the quality of the data collected. This is a concern we have expressed in a previous comment letter to the Board and during meetings with Board and Reserve Bank staff.<sup>6</sup>

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<sup>6</sup> Letter to Robert deV. Frierson from FSR and the American Bankers Association on proposed changes to FR Y-14A/Q/M, August 26, 2013; [http://www.federalreserve.gov/SECRS/2013/September/20130918/ICP-201313/ICP-201313\\_082613\\_111359\\_351318937073\\_1.pdf](http://www.federalreserve.gov/SECRS/2013/September/20130918/ICP-201313/ICP-201313_082613_111359_351318937073_1.pdf)

**B. The Board should establish a minimum of six months between the finalization of reporting and technical requirements and the effective date of the schedules impacted by the requirements.**

We recommend that the Board establish a minimum of six months between the finalization of reporting *and* technical requirements and the effective date of the schedules impacted by the requirements. Reporting companies often are given insufficient time to make the required changes. The current Notice is an example. The Notice was issued in mid-September and reporting companies were given 60 days to analyze the proposed changes and assess the availability of the data requested. Final instructions, however, are not expected to be published until late December, and technical instructions will not be available until January 2016. Yet, as Table 1 shows, most of the changes proposed in the Notice are scheduled to be effective on December 31, 2015.

Table 1  
Effective Dates

Schedule	Effective Date
<b>14A</b>	
A.1.c.1 (General RWA)	December 31, 2015
A.1.c.2 (Standardized RWA)	June 30, 2016
A.1.d (Capital)	December 31, 2015
A.2.b (Retail Repurchase)	June 30, 2016
A.2.c (ASC 310-30)	June 30, 2016
A.7.c (PPNR Metrics)	December 31, 2015
D.4 (Regulatory Capital Transitions-- Standardized RWA)	December 31, 2015
Proposed Schedule F (Business Plan Changes)	December 31, 2015
<b>14Q</b>	
A.1-A.10 (Retail)	December 31, 2015
A.8 and A.9 (Retail-International Small Business and U.S. Small Business)	December 31, 2015
B (Securities)	December 31, 2015
C.3 (Regulatory Capital Instruments – Issuances During Quarter)	December 31, 2015 and June 30, 2016
D.4 (Regulatory Capital Transitions – Standardized RWA)	December 31, 2015
G (PPNR)	The proposal does not include an effective date for this change.
H.1 and H.2 (Corporate Loan and Commercial Real Estate)	March 31, 2016
H.1 (Corporate Loan)	March 31, 2016 and December 31, 2015
L (Counterparty)	December 31, 2015
M (Balances)	December 31, 2015
<b>14M</b>	
A (First Lien)	December 31, 2015
B (Home Equity)	December 31, 2015

A six-month period following the finalization of the reporting and technical requirements would allow reporting companies to adhere to standard software development life cycles (SDLC). This includes writing requirements, establishing project timelines, update coding, mapping, validation, scheduling releases to production, testing and changes to affected reporting structures. If major structural changes are requested (such as changing the Wholesale 14Q from a facility to a loan level submission or adding a peripheral collateral collection with linkages to the Corporate and CRE 14Q submissions), a significantly longer lead time, such as one year, would be needed to accommodate the changes.<sup>7</sup>

We have raised the challenges associated with compressed implementation time frames in our meetings with Board and Reserve Bank staff and in prior comment letters to the Board. Last year, for example, we noted that the Board and respondents have a common interest in addressing this problem:

The Board and reporting companies have a common interest in ensuring that data submitted are accurate and usable. To achieve this goal, the Associations believe that one of the most important adjustments the Board could make to the current process is to establish an agreed upon timeline for change requests to allow reporting companies adequate time to update coding, mapping, validation, and reporting structures. More specifically, we recommend that changes not be effective prior to six months from issuance of a final rule, and longer time periods may be necessary if changes affect multiple or complex fields, similar to instruction changes for the Y 9C submission. Such transitional arrangements are necessary in light of the considerable complexity introduced by many of the new changes in the reporting fields, particularly those related to securities financing transactions (SFTs) and derivatives, which, in some cases, involve unprecedented requests for granular information, and may even go so far as requiring firms to de-construct and re-aggregate data in a manner that disregards legally enforceable netting sets.

The accuracy of data submissions is enhanced when reporting companies are able to establish governance structures and software systems for capturing, reviewing, validating, and reporting the data. Conversely, the accuracy of data submissions can be jeopardized when companies are required to submit data without sufficient lead time to make appropriate adjustments to systems, protocols, and procedures. In such cases, companies must develop short-term "work-arounds" to existing systems or collect the data manually, which pose problems for operational risk management and can impair the integrity of the data. Also, sudden and/or quick reporting requirement changes may be inconsistent with supervisory guidance BCBS 239, Principles for Effective Risk Data Aggregation and Risk Reporting (January 2013). A minimum period of six months between the issuance of a final rule and the effective date of the proposed changes would avoid this problem and improve the quality of

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<sup>7</sup> Appendix A in Attachment A provides an example of a change that requires a full year to implement under standard SDLC protocols.

the data received by the Board while reducing the potential for inadvertent and unintentional filing problems that may result.<sup>8</sup>

In 2013 and, again in 2014, the Board acknowledged the challenges associated with implementing changes to the FR Y-14 reporting requirements in a timely manner when changes are finalized close to the reporting deadline and stated that it was “carefully considering various longer-term options to address this comment that would increase the time between the finalization of changes to the FR Y-14 and their implementation date.”<sup>9</sup> We appreciate the consideration that the Board has given to this matter in the past, and strongly urge that the Board use this Notice as an opportunity to resolve this challenge.

### **C. Technical instructions should be published in tandem with proposed and final reporting instructions.**

It also is important that the effective date for changes be delayed until all technical instructions related to proposed changes are finalized. Currently, only the reporting instructions are subject to public notice and comment, and the technical instructions often are released weeks, if not months, after the reporting instructions. For example, this year, technical instructions for the FR Y-14Qs were released on April 13 for submissions due on May 18; July 13 and August 5 for submissions due on August 17; and again on October 5 and November 4 for submissions due on November 16. Also, the technical instructions for the FR Y-14A DFAST were released on May 20, June 15 and June 29 for a submission due on July 6.

Reporting companies cannot make the systems and process changes needed to comply with a change in a schedule until after the technical requirements are finalized. The technical instructions dictate the manner in which data is captured, transported, validated, and assessed.<sup>10</sup>

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<sup>8</sup> Letter to Robert deV. Frierson from FSR and the American Bankers Association on proposed changes to FR Y-14A/Q/M and FR Y-16, September 14, 2014; [http://www.federalreserve.gov/SECRS/2014/September/20140929/ICP-201407/ICP-201407\\_091514\\_129619\\_379673996344\\_1.pdf](http://www.federalreserve.gov/SECRS/2014/September/20140929/ICP-201407/ICP-201407_091514_129619_379673996344_1.pdf)

<sup>9</sup> 78 Fed. Reg. 59936 (Sept. 30, 2012) and 79 Fed. Reg. 59266 (Oct. 1, 2014).

<sup>10</sup> The technical instructions typically consist of four key documents: (1) a Data Dictionary (DD), which dictates the manner in which data is *captured*. For every data element, the DD also specifies critical information such as technical field name, field format and data type, whether or not an element is a primary key or if it is a derived item and the applicable collection period (effective start and end dates) which is critical to know should data need to be resubmitted; (2) the XML Schema (for schedules managed through the FRB statistics function). The XML Schema Definition is a file (.XSD) which defines how data elements are *stored, transported and validated*. An XSD describes a set of rules to which an XML document must conform in order to be considered valid according to that schema. XSD describes the structure of an XML document. The Board requires XML data files to be validated against a prescribed schema. This impacts whether the XML data can be loaded successfully to the Board's system; (3) Edit Checks (ECs). These are Board prescribed rules (one inventory per FR Y-14 schedule) that are run against FR Y-14 schedules (submission files). Using rules-based testing, ECs *assess* a respondent's data on several fronts – syntax (tests for proper data type and format), validity (tests for data accuracy, i.e. “the condition *must* be true”), quality (tests for data accuracy and reasonableness, i.e. “the condition *should* be true.”). ECs also monitor for unusual period over period changes in data (Intraserries edits) and for discrepancies against another report series, e.g. FR Y-9C (Interseries edits).



Delaying the implementation of changes until all technical requirements are finalized also would enable both respondents and Board and Reserve Bank staff sufficient time to reconcile discrepancies between the reporting and technical instructions. On several occasions, FSR members have found inconsistencies between technical specifications and reporting instructions. These inconsistencies have caused some confusion and can lead to delays in gathering data.

We recommend that the Board publish technical specifications (Data Dictionary, XSDs, Edit Checks, XML templates, etc.) in conjunction with proposed and final reporting instructions in order to provide reporting companies the ability to: (1) review new or revised guidance as a whole; (2) identify any potential conflicts or inconsistencies, provide feedback and/or seek clarification in a timely fashion; and (3) give internal technology resources the ability to be proactive.

Moreover, public comment on proposed technical instructions would allow respondents the ability to provide appropriate feedback on the feasibility and burden incurred with such proposed changes and decrease the probability for edit check issues going forward.

Additionally, we recommend that reporting instructions incorporate other forms of published guidance, such as citing specific FAQs that are both relevant and resolved, or updating the instructions to include that guidance. All forms of published guidance and reference materials should be version-controlled to facilitate clear and easy Q&A between respondents and Board and Reserve Bank personnel.

Finally, the Board should publish the technical instructions in order to meet the requirements and purpose of the Paperwork Reduction Act (PRA). The PRA requires the Board to publish this notice and specifically solicit comment to:

- (i) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;
- (ii) Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
- (iii) Enhance the quality, utility, and clarity of the information to be collected; and

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Also, like the DD, an applicable edit period (effective start and end dates) is specified to advise when a rule is active. This is critical to know should data need to be resubmitted; and (4) FR Y-14 Q/A Technical Submission Instructions. This document is published by the Board to explain the submission process and subtleties of XML files – creation and validation procedure, submission / resubmission (e.g. Transtype details), file naming conventions; version conventions, primary key rules, and provides technical guidance on ("Respondent Edit Reports" files).

- (iv) Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.<sup>11</sup>

Without the technical instructions, which the Board has not made publicly available, the public cannot fully comment on the above listed factors. As noted above, the technical instructions contain critical information needed to evaluate the reporting forms. Without the technical instructions, it is not possible to fully evaluate the accuracy of the agency's estimate of the burden. Exactly what information is to be collected also cannot be fully commented on without the technical instructions. We ask the Board to make the technical instructions publicly available for comment. Withholding the technical instructions at least frustrates the purpose of the PRA and its implementing regulations and at most is a violation of the PRA.

Separately, the PRA requires agencies to make the proposed collection of information publicly available at the time the 60-day notice is published in the Federal Register.<sup>12</sup> The PRA implementing regulation defines "collection of information" to mean, in part, "the soliciting... of information... by means of identical questions posed to, or identical reporting, recordkeeping, or disclosure requirements imposed on, ten or more persons."<sup>13</sup> A collection of information "may be in any form or format."<sup>14</sup>

The technical instructions are highly detailed. Institutions cannot complete the reporting forms without the detailed information in the technical instructions. Therefore, it seems that the technical instructions are part of the "collection of information" under the PRA. As such, the technical instructions should be publicly available for review and comment when the Board publishes the 60-day notice in the Federal Register.

#### **D. Clarifying questions should be addressed before the effective date of a change.**

Changes to reporting schedules should not be effective before all questions surrounding those changes are resolved. This Notice is illustrative of this challenge. In Section III, below, we raise a number of questions about the changes in the schedules proposed in this Notice. Respondents cannot properly respond to the proposed changes until these questions are answered. In setting the effective dates for changes, the Board needs to factor in the time required for implementing clarifications into the reporting cycle along with related internal controls and testing. The failure to resolve questions on a timely

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<sup>11</sup> 5 C.F.R. § 1320.8(d)(1).

<sup>12</sup> 5 C.F.R. § 1320.8(d)(2); Memorandum from John D. Graham, Administrator, Office of Information and Regulatory Affairs, Office of Management and Budget, for the President's Management Council, "Guidance on Agency Survey and Statistical Information Collection," 3 (Jan. 20, 2006).

<sup>13</sup> 5 C.F.R. § 1320.8(c).

<sup>14</sup> 5 C.F.R. § 1320.8(c)(1).

basis compounds the reporting challenges for respondents and increases the risk of counter-productive data for the Board.

**E. The Board should prioritize data requests.**

In addition to addressing the frequency of changes and the time period for implementing changes, we recommend that the Board prioritize the data requested as part of the FR Y-14 data collection to ensure that it is relevant to supervisory objectives. Data that is not clearly related to credit, market and operational risks should not be part of this reporting process. Similarly, data that is no longer used by Board and Reserve Bank staff should be removed from future data collections. For example, there are numerous fields within the PPNR Metrics schedule that include data that does not appear to be relevant for the purpose of the data collection exercise and stress testing that should be removed. We appreciate the need to submit data that the Board deems appropriate for supervisory purposes. However, we would prefer to focus our efforts on the data that is most relevant to the safety and soundness of our institutions and the economy. This is an issue that we have raised in a previous comment letter to the Board.<sup>15</sup>

**II. ADDITIONAL RECOMMENDATIONS FOR ENHANCING THE QUALITY, UTILITY AND CLARITY OF INFORMATION COLLECTED**

In addition to the recommendations discussed above, we have several other recommendations for improving the quality, utility, and clarity of the data. These additional recommendations also appear in Attachment A, which is a presentation FSR members made to Board and Reserve Bank staff at a meeting this past October.

**A. The Board should develop a calendar to accompany the FR Y-14 reporting requirements.**

We recommend that the Board develop, maintain, and adhere to a calendar that lists filing due dates (e.g., final instructions, FAQs, publish dates), as well as expected deadlines for updates to technical specifications and FAQ documents. This tool would enhance the transparency of the filing process, and reduce questions regarding the process.

**B. The Board should make improvements to the FAQ process.**

We do not believe that the decrease in FAQs submitted by respondents is a sign that the FR Y-14 process has matured. Instead, we believe that the decrease indicates a lack of confidence in the current FAQ process. For example, the process of distributing FAQs quarterly does not provide accurate lead time to respond to FAQs that may affect a reporting company.

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<sup>15</sup>Letter to Robert deV. Frierson from FSR and the American Bankers Association on proposed changes to FR Y-14A/Q/M and FR Y-16, September 14, 2014; [http://www.federalreserve.gov/SECRS/2014/September/20140929/ICP-201407/ICP-201407\\_091514\\_129619\\_379673996344\\_1.pdf](http://www.federalreserve.gov/SECRS/2014/September/20140929/ICP-201407/ICP-201407_091514_129619_379673996344_1.pdf)

In order to improve the FAQ process, we recommend that the Board establish: (1) tracking numbers for submissions so reporting companies can track the status of a question on a real-time basis; (2) mutually agreeable Service Level Agreements (SLAs) for each response; (3) a searchable database for FAQs, so reporting companies can retrieve and review previously submitted questions; (4) a process for reporting companies to submit an FAQ on a confidential basis; (5) a more frequent schedule for FAQ distribution (i.e., every 4 weeks); and (6) a standard timeline for resolution of inquiries.<sup>16</sup>

Additionally, to further enhance communications between reporting companies and Board and Reserve Bank personnel, we recommend that the Board arrange for (1) direct contact to the individual Board subject matter experts (SMEs) for each portfolio, and (2) periodic meetings between SMEs and reporting companies to address questions.

Finally, in the Notice, the Board states that it intends to address unanswered FAQs, the related to the Y-14A/Q/M reports in the same manner as unanswered questions related to the Y-9C report: "As long as a firm has a reasonable and timely process for identifying questions and submitting FAQs, the firm makes a good faith effort to reasonably interpret the instructions while awaiting a response, and the firm, in fact, follows that process, the Federal Reserve would not expect to penalize a firm for incorrect reporting on the 14A/Q/M reports."<sup>17</sup> We welcome and support this approach.

#### **C. The Board should establish a confirmation process for data submissions.**

Currently, there is not a clear process for respondents to confirm receipt of data files. Unless a respondent's point of contact is advised by the respondent to look for recently submitted files in IntraLinks, there is no communication beyond an IntraLinks update log, which is provided to respondents after the upload is complete. We recommend that the Board establish a file confirmation process for all files that are submitted as part of the FR Y-14 data requirements. We also recommend that a respondent's point of contact manually confirm receipt of documents sent via FR Secure Message Center.

#### **D. The Board should establish a formal procedure for test files.**

We recommend that the Board establish a formal procedure for test files. For the FR Y-14Q and FR Y-14A submissions, we recommend that: (1) the environment open 15 days before the submission due date to allow for test submissions; (2) test submissions be loaded and all edit checks run against the test submission; (3) all edit results be returned to the reporting company within 24 hours of a test submission upload; and (4) the number of test submissions, the amount of edit fails, and any data anomalies within the test

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<sup>16</sup> Depending on the complexity or specificity of the subject matter, a recommended timeline would be from 2-4 weeks. This process could include an agreement with a respondent that all inquiries will be addressed in a timely manner (e.g., within 2 weeks) and that an escalation process will be triggered when responses are not received within the agreed upon timeline.

<sup>17</sup> 80 Fed. Reg. 55624, Sept. 16, 2015.

submission not have any negative bearing on a company's quantitative or qualitative results. For the FR Y-14M data, we recommend that the environment open 5 days before the submission due date.

Such a testing protocol would facilitate better submissions and would provide the Board a quality assurance process on newly defined edit checks as reporting companies would be able to comment on unexpected/incorrect edit checks and the Board could correct these edit checks before the submission due date.

Such a testing protocol also would save reporting companies a considerable amount of resources and time. For example, BlackKnight currently offers this same functionality for the FR Y-14M. The cost of this service is \$8,000 per month with a one-time set up fee of \$8,000. Other more comprehensive vendor options available for the FR Y-14Q and FR Y-14A are significantly higher in cost.

**E. The Board should create and distribute enhanced XSDs.**

We recommend that the Board create and distribute enhanced XSDs. Such a step would eliminate the need for most, if not all, syntax edit checks and reduce the quantity of validity edit checks run against each submission. Respondents should be required to validate against the published XSDs. If such a process were implemented, a significant amount of FR Y-14 edits could be eliminated. This would reduce the time and burden on the Board to maintain, distribute, and verify edit check results. It also would reduce the burden on respondents to implement and maintain such edit checks as well as to respond individually to each edit failure that occurs.

We provided Board staff with an example of an enhanced XSD in October. That prototype eliminated nearly 2,000 edit checks in the FR Y-14A Summary Schedule.

**F. The Board should introduce tolerances/thresholds for any facility/loan level submission similar to what is done for the retail loan schedules on the FR Y-14Ms.**

Board examiners, as well as internal auditors, typically interpret edit checks as errors even though there may be a legitimate business or product reason for the edit check. To minimize this problem, we recommend that the Board introduce tolerances/thresholds for any facility/loan level submission similar to what is done for the retail loan schedules on the FR Y-14Ms.

**G. The Board should remove edit checks that cause false positive exceptions or, alternatively, provide reporting companies with feedback identifying the reason an edit check should remain in effect.**

We recommend that the Board remove edit checks that cause false positive exceptions or, alternatively, provide reporting companies with feedback on the reason an edit check should remain in effect. In advance of our most recent meeting with Board and



Reserve Bank staff, we submitted a comprehensive list of such edit check issues. That submission appears as Attachment B.

**H. The Board should establish a formal process to proactively solicit reporting companies' input on potential major changes in reporting requirements prior to formal publication of the proposed change.**

We recommend that the Board establish a formal process to proactively solicit input from reporting companies before major changes in reporting requirements are proposed. Such a process would help reporting companies and the Board better understand the feasibility of a proposed change and would decrease the probability of misinterpretation of a new requirement.

There is good precedent for this process. Board staff engaged in such a process informally with reporting companies last year in connection with potential changes to the FR Y-14Q wholesale schedule. Board staff also provided a preview of FR Y-14M FL & HE proposed items and solicited feedback from respondents in advance of formal publication. Additionally, this past June, Board staff shared a proposal for the changes in collection of loan level auto data. Furthermore, a draft data dictionary was provided to solicit reporting companies' feedback from general and technical perspectives. FSR members welcome these initiatives and recommend that the Board continue to proactively engage respondents prior to issuing a proposal for significant instruction requirement changes.

**I. The Board should make adjustments in the process related to acquisition and historical data.**

We recommend that the Board formalize a process to incorporate historical data from acquisitions into the edit check process. Such a process would provide clarity on the requirements for reporting of historical data (i.e., Net Operating Income at Origination, Value at Origination, etc.). We also recommend that the Board consider good faith efforts by respondents in populating static and/or historical data on acquired portfolios and grant exemptions on data gaps as appropriate. The information systems of acquired portfolios tend not to house all of the attributes required for CCAR reporting.

**J. The Board should establish a data dictionary.**

We recommend that the Board establish a FR Y-14 data dictionary that is based upon industry standards (e.g., MISMO/FHA). This appears to be occurring with the introduction of the 14A XML MDRM. However, the consolidation of how schedule data points are referenced needs to be considered (e.g., 14A Summary Schedule MDRM vs. 14Q PPNR technical codes vs. 14QPPNR line item codes vs. 14Q Retail schedule column names).

**K. The Board should coordinate the FR Y-14 requirements to the data requirements of other agencies.**

We recommend that the Board improve coordination of data submissions with other regulatory agencies that request similar, if not the same, data. For example, there is a need for greater coordination between the Board and the FDIC and OCC on CCAR/DFAST submission file formats (XML vs Excel).

**III. COMMENTS ON PROPOSED CHANGES TO SCHEDULES**

**A. Proposed Changes to 14A**

**1. Schedule A.1.c.1 (General RWA) and Schedule A.1.d (Capital)**

*Proposed Change*

The Board has proposed to eliminate the use of the tier 1 common ratio in these two schedules, effective December 31, 2015. FSR supports this change. However, the Board has proposed not to make a corresponding change in the technical instructions for the 2016 CCAR submission “in order to allow for appropriate time to accommodate changes in the schedule.”

*FSR Comment*

We recommend that the Board also eliminate the use of the tier 1 common ratio in the technical instructions at the same time it eliminates the use of the ratio in the schedules. The existing technical instructions require respondents to filter thousands of “failed” edit checks to assess the applicability of the ratio. Not removing the tier 1-common-related edit checks within the technical instructions will add a significant burden to respondents within the 24 hour window that the Board has imposed for FR Y-14A responses. Additionally, though we welcome the removal of the ratio from the schedules, the failure to remove the ratio from the instructions at the same time illustrates that the current process surrounding changes detracts from the Board’s desire to establish an effective and controlled process.

**2. Schedule A.1.c.2 (Standardized RWA)**

*Proposed Change*

The Board is proposing to modify this schedule to increase consistency with the FR Y-9C and FFIEC 102 reports by replacing the existing market-risk weight asset portion with the relevant items from the FFIEC 102 and aligning the remaining items with the FR Y-9C Schedule HC-R Part II. The Board also is proposing similar changes to Schedule D.4 (Regulatory Capital Transitions—Standardized RWA).

*FSR Comment*

We have no objection to these changes. However, the effective dates for these changes are not the same. The changes to Schedule A.1.c.2 are proposed to be effective as of

June 30, 2016. The changes to Schedule D.4 are proposed to be effective as of December 15, 2015. We recommend that the effective dates be consistent and set for June 30, 2016.

### 3. Schedule A.2.B (Retail Repurchases)

#### *Proposed Change*

The Board is proposing that this schedule be separated from the FR Y 14A Schedule A and become its own semi-annual schedule. Additionally, for the two reported as-of-dates, this schedule should be due seven calendar days after the FR Y-9C. The proposed change would be effective June 30, 2016.

#### *FSR Comment*

We are concerned that the proposed semi-annual collection would not allow reporting banks sufficient time to perform the necessary control steps to ensure that the reported data is accurate. We strongly recommend that this proposed change be deleted because it cannot be implemented by June 30, 2016 in a manner consistent with supervisory expectations as well as internal governance procedures. For forecasted data within this template, respondents stress testing procedures require significantly more time, as dictated by both supervisory expectations and internal policies and procedures.

### 4. Schedule A.2.c (ASC 310-30)

#### *Proposed Change*

The Board is proposing to eliminate this schedule effective June 30, 2016.

#### *FSR Comment*

We support this proposed change. While we generally support a six month window between the final reporting and technical instructions and the effective date of a change, it is easier to remove a minor reporting item than to establish a new one or change an existing one. Generally, there is little, if any, procedural or system development needed when eliminating a reporting item.

### 5. Schedule A.7.c (PPNR Metrics)

#### *Proposed Change*

The Board is proposing to align this schedule with the stress scenarios instead of the current “normal environment” requirement. This change would be effective December 31, 2015. The proposed PPNR metric schedule calls for information that is not normal and imposes an unnecessary burden on reporting companies.

#### *FSR Comment*

As noted above, we recommend that the Board periodically review the data that is required to be submitted and remove items that are no longer necessary. The PPNR Metrics schedules provides an example; they contain various data items that are not an intrinsic output to respondents’ forecasting process and imposes an unnecessary burden on respondents.

#### 6. Schedule D.4 (Regulatory Capital Transitions—Standardized RWA)

##### *Proposed Change*

The Board is proposing to modify this schedule in accordance with FFIEC 102 and FR Y-9C Scheduled HC-R.

##### *FSR Comment*

See comment on Schedule A.1.c.2, above. Additionally: (1) there is no visual (i.e., PDF) included in the instructions; and (2) the instructions do not appear to be updated when compared to the snapshot of the proposed reporting template.

#### 7. Proposed Schedule F (Business Plan Changes)

##### *Proposed Change*

The Board is proposing a new schedule that collects the effects of an intended business plan change on a reporting bank's asset, liability, and capital projections. This new schedule would be effective December 31, 2015.

##### *FSR Comment*

The current proposal includes the formalization of the Business Plan Changes schedule into the FR Y-14A. We appreciate the Board's efforts to move away from ad hoc schedules toward more structured, repeatable requirements. That said, we are concerned with the draft instructions included in the proposal for the Business Plan Changes schedule as they are not consistent with broader FR Y-14A Instructions and do not incorporate any of the previously submitted FAQ guidance around this schedule. In current proposal form the draft instructions raise a number of questions, including a request for clarification on how to define "material". Ideally the industry would be allowed to comment on proposed instructions that are closer to final state (i.e., consistent with other schedule instructions and comprehensive of FAQ guidance).

#### 8. Schedule A.1.c.3 (Advanced RWA) and 14A Supporting Documentation

##### *FSR Comment*

This schedule and the supporting documentation should be updated to refer to 2016 CCAR, not 2015 CCAR.

### **B. Proposed Changes to FR Y-14Q**

#### 1. Schedules A.1-A.10 (Retail)

##### *Proposed Change*

The Board is proposing to restrict the loan population of this schedule to accrual loans. This change would be effective December 31, 2015.

*FSR Comment*

We request additional information regarding this proposed change. As noted above, the Notice states that the purpose of this change is to limit reporting to accrual loans. However, the draft instructions state “Only include loans and leases held for investment at amortized cost...” Accrual loans are typically considered to be those that are performing, the opposite of non-accrual loans, which are non-performing. This inconsistency between the proposal and draft instructions needs to be clarified. The instructions also are inconsistent with the FAQs on this topic. Additionally, if the Retail Schedules A.1-A.10 are amended to exclude non-accrual loans it is not clear where non-accrual loans should be reported because there are no corresponding changes to the Supplemental (K) or Balances (M) Schedules to facilitate reconciliation with the FR Y-9C Schedule HC-C.

2. Schedules A.8 and A.9 (Retail – International Small Business and U.S. Small Business)

*Proposed Change*

The Board is proposing to exclude non-purpose loans and loans for purchasing and carrying securities from this schedule. The changes to these schedules would be effective December 31, 2015.

*FSR Comment*

Complex, product-specific loan tagging rules will need to be changed in respondents’ systems to cease reporting these loans at the segment level on the FR Y-14Q Schedules A.8 and A.9 and commence reporting these loans at the facility level on the FR Y-14Q Schedule H.1 (Corporate Loan), for those facilities that exceed the \$1MM reporting threshold. The complexity of this change warrants additional lead-time, particularly so since the 31-Dec-2015 (2015Q4) reporting cycle has already started, with loans already having been tagged at October month-end for reporting on the FR Y-14Q Schedules A.8 and A.9. We recommend providing respondents with additional time to make system changes in conformance with this proposal and implement effective with the June 30, 2016 reporting.

3. Schedule C.3 (Regulatory Capital Instruments – Issuances During Quarter)

*Proposed Change*

The Board is proposing several changes to this schedule, effective December 31, 2015 and June 30, 2016. Specifically, the Board is proposing to: (1) add an item that collects the currency in which the instrument is denominated to be able to account for changes in exchange rates; (2) add options to the Index Item for Canadian Dealer’s Offer Rate, Australian Bill Bank Swap, and UK Libor as well as 1M, 3M, and 6M maturities for all reference rates as well as require respondents to specify the index used when Other is reported in order to accurately calculate contractual expenses; (3) restrict the reporting of BHC-provided identifiers to only cases in which a CUSIP or ISIN identifier is unavailable; (4) add options to identify coupons that “step up” or transition from fixed to floating as well as items to identify the date on which the contractual terms change, the reset coupon, and the spread over index, also to more accurately calculate contractual terms; (5) add items to capture the details of interest rate swaps matched to subordinated debt – issue



date, maturity date, notional amount, fixed payment rate, payment index, and payment spread over index; (6) add items to capture the details of foreign exchange swaps matched to subordinated debt currency denomination of the instrument, currency of the payment, notional amount, and exchange rate; and (7) add items that collect the unamortized discounts, premiums and fees, the fair value of the swap, and the carrying value of the swap as well as an item that reconciles the carrying value to the FR Y-9C.

*FSR Comment*

We assume that these changes apply only to the 14Q schedule and not to the 14A schedule. We also assume the proposed items for the 4Q2015 and 1Q2016 are only for a one-time data submission. The changes for 4Q2015 do not remain in the proposed draft instruction for 1Q2016. Is this an oversight or does the Board intend to propose two separate requests for two one-time data collections?

4. Schedule D.4 (Regulatory Capital Transitions – Standardized RWA)

*Proposed Change*

The Board is proposing to modify this schedule in accordance with FFIEC 102 and FR Y-9C Schedule HC-R. The modifications would be effective December 31, 2015.

*FSR Comment*

We have no objection to these changes, but recommend that the effective date of the proposal be changed to June 30, 2016 so it is in harmony with parallel changes to Schedule A.1.c.2.

5. Schedule G (PPNR)

*Proposed Change*

The Board is proposing to eliminate the deposit funding threshold and requiring submissions from all respondents.

*FSR Comment*

The Federal Register notice does not include an effective date for this change.

6. Schedules H.1 and H.2 (Corporate Loan and Commercial Real Estate)

*Proposed Change*

The Board is proposing to make several changes to these schedules, with effective dates of December 31, 2015, and March 31, 2016. The proposed changes would: (1) expand the loan population to include loans that were disposed during the reporting period and add the item Disposition Flag that collects the disposition method in order to capture the difference in loan characteristics; (2) expand the options of the Participation Flag item for agent, participant, and inclusion in the Shared National Credit report in order to effectively identify syndicated loans; (3) add the item Leveraged Loan Flag that identifies leveraged loans across all wholesale loans; (4) add the item Participation Interest that captures the percent of the commitment held by the respondent for participated or syndicated loans; (5)

eliminate the restriction to the loan population of legally binding commitments; (6) add five categories to the Credit Facility Purpose item to capture non-purpose margin loans, non-purpose loans collateralized by securities for other purposes, dealer floor plan, equipment leasing, and bridge financing in order to more accurately require such loans to be reported as wholesale loans; (7) add two categories to the Credit Facility Type item to identify fronting exposures and swinglines to appropriately capture their unique characteristics in supervisory modeling; (8) add two items – Syndicated Loan Flag and Target Hold – that capture the status of the credit and the share of the credit that the respondent intends to retain upon clearing of the deal in order to assign credit risk throughout the syndication process; and (9) expand the loan population to include non-purpose loans that are not graded.

*FSR Comment*

a. Syndicated Pipeline Reporting

i. By removing the legally binding restriction to the loan population, is it the Board's intention to report all facilities in the syndicated loan pipeline or just those facilities that would be considered commitments to commit based on a reporting company's legal definition?

ii. Including *potential* exposures within a schedule that, heretofore, was limited to the reporting of *actual* closed commitments could be confusing, leading to inappropriate conclusions about a reporting company's overall exposures.

iii. By including such pipeline commitments as early as upon issuance of a commitment letter to the borrower, reported exposures could be misrepresented or overstated, particularly when viewed across the participating reporting companies. For example: (1) The reported exposure may never materialize, as the borrower could refuse to countersign the commitment; (2) The final structure of the transaction, including the BHC's exposure therein, could substantively change between initial reporting and the final closing of the transaction; (3) The number of bidding bank holding companies can often exceed the number of bank holding companies that ultimately participate in the syndication, resulting in an overstatement of potential exposures and levered positions within and across the reporting bank holding company; (4) Syndication members may not all be identified prior to the closing of the transaction, or in some cases, the transaction will close and then additional syndication members will be sought.

iv. Because these are not closed commitments, information about these syndicated pipeline commitments is generally not captured in a reporting company's loan accounting systems, but is maintained "offline." At this early stage, many of the details of these potential exposures that would be required to be reported are not captured systemically, but would only appear in analytical documents (e.g., credit memos) and other artifacts that are not readily "mine-able" for reporting purposes. Thus, reporting companies would face a significant, on-going manual burden to somehow systematically collect the required detail on syndicated pipeline commitments to support the requested reporting, particularly

at the level of detail required. Additionally, absent proposed changes for how to populate correctly the Origination Date, Maturity Date, and Committed Exposure Global for pipeline loans, the Board has provided no guidance on which Corporate Loan (Schedule H.1) fields would be required at time of submission. In summary, if this request is finalized it will be a major burden for reporting companies. The implementation timeline easily could be greater than 12 months for institutions that require new technology to be put in place. We strongly recommend that this amount of granular data not be considered within an existing Y-14Q/M schedule. Pipeline loan level information is very different than formal on-balance sheet loans; the type of information collected is not applicable to the CRE or Corporate schedules.

v. This request is contrary to the Board's efforts to align the FR Y-14A/M with the FR Y-9C. Pipeline loans are not included on FR Y-9C Schedules HC-C, HC-L, and HC-R.

#### b. Disposed Loans

i. We request that the Board clarify the intended purpose of this proposed new field. Is the purpose to "end-date" each record submitted in the Corporate Loan (H.1) and CRE (H.2) Schedules? If so, we recommend that the Board consider adding Disposition Flag values for when loans fall under the \$1M reporting threshold, or shift from one loan schedule to another. Examples include an owner occupied commercial real estate secured construction loan that completes construction resulting in the loan shifting from the CRE Schedule (H.2) to the Corporate Loan Schedule (H.1), or a C&I loan that pays down to under \$1M and either shifts to the Supplemental Schedule (K) or transitions from an internally graded loan to a scored/managed loan and shifts to the US Small Business Schedule (A.9).

ii. The reporting of disposed loans can conflict with the minimum \$1MM reporting threshold, leading to loans being removed from and subsequently put back on these or other schedules. As an example: (1) At 3/31/16, a fully funded term loan with exposure of \$1.1MM is included on the Corporate Loan schedule; (2) During the 2<sup>nd</sup> quarter the loan is paid down to a balance of \$800,000. Thus, at 6/30/16 it does not qualify for inclusion in the Corporate Loan schedule and is removed. Depending upon how the bank holding company defines a scored vs. graded loan, the loan might be reported on the Small Business Schedule; (3) Over the course of the next three years, the loan continues to pay down until, finally, on 6/30/19 the loan is paid in full. At that point, three years after it was last reported, the loan would need to be re-added to the Corporate Loan schedule and reported as a disposed loan.

iii. Typically, disposition reasons are not captured by most reporting companies on commercial loans, making it difficult to distinguish the various scenarios under which a loan can "pay down" to \$0. Examples include: (1) Voluntary vs. Involuntary Payoff: Unless limited to situations where a non-accrual loan is paid in full by the borrower, it may not be possible for bank holding companies to systematically distinguish voluntary from involuntary payoffs, an involuntary being defined in the instructions as a situation "where the credit facility has been paid in full after the occurrence of default per the terms of the credit agreement;" (2) Transfer to REO. Typically the balance transferred to REO is

recorded as an undistinguished payment, with the remainder being charged off; (3) Re-books and restructures where loan balances are transferred or combined between and amongst obligations. A disposition reason is not provided that fits this scenario, even when it can be identified systemically

iv. Given quarterly reporting, details about a paid off loan may drop from a reporting company's reporting system prior to the loan actually needing to be reported as a disposed loan. For instance, if a loan pays off on 1/2/16, details of that now paid off loan may drop from the company's reporting system prior to that loan actually being reported as disposed on the 3/31/16 Corporate Loan schedule. For reporting efficiency reasons, it is not atypical for reporting companies to remove paid-out loans from their reporting systems in the month following that loan's payout.

v. Does capturing the data as of the date of disposition mean capturing balances and indicative data prior to the actual payoff or charge off of the facility?

#### c. Legally Binding Commitments

i. The proposed instructions remove the requirement that only legally binding commitments be reported. Does this mean that unfunded exposure on all non-legally binding commitments, including internal guidance lines that have not been advised to the customer, needs to be reported? Must such exposures be reported regardless of whether or not they are included on Schedule HC-L, or should reported commitments, whether deemed legally binding or not, be included on the Corporate Loan schedule only if they are also reported on HC-L? If it is the Board's intention to align the FR Y-14Q with the Y-9C, then the revised instructions could be in conflict with that objective. Furthermore, the proposed instruction in H.1CII that directs reporting companies to include a commitment "even if the borrower has not countersigned the commitment letter" should be reconsidered to align with Y9C HC\_L item 6 reporting definitions, and to evidence a borrower's acceptance of the offered terms. Without evidence of a borrower's acceptance, an institution does not consider the transaction to be a "commitment".

ii. The language for H.1 is not consistent with language for the H.2 schedule. Was this by design? The revised instructions for the Corporate Loan schedule remove the legally binding restriction, but those for the Commercial Real Estate schedule appear to retain this restriction (i.e., continue reporting only legally binding CRE facilities). Is it the Board's intention to exclude CRE from the elimination of the legally binding restriction?

#### d. Non-Purpose Loans

i. The proposed instructions define "non-purpose loans" as "loans collateralized by securities made for any purpose other than purchasing or carrying securities." The systems at reporting companies do not necessarily track the use of funds and typically there is no contractual restriction on loans that are normally considered non-purpose loans to ensure that the borrower does not purchase securities with those funds. Therefore, we recommend that the Board revise the definition of non-purpose loans to be "loans

collateralized by securities and that the proceeds of such loans are not contractually restricted to be used only to purchase or carry securities.” This change would ensure that securities based loans that are not classified as “loans for purchasing and carrying securities” will fall under the definition of non-purpose loans.

ii. These loans are to be included on the 12/31/15 Corporate Loan schedule, yet use of the new purpose codes associated with such loans are not required until the 3/31/16 schedule. Both the reporting of such loans and the new purpose codes to distinguish them should be implemented concurrently.

iii. While the Schedules A.8 and A.9 proposal indicates excluding non-purpose loans and loans for purchasing and carrying securities, this proposal only mentions expanding the loan population to include non-graded non-purpose loans, leaving unclear whether non-graded loans for purchasing and carrying securities are to be reported at the facility level for those facilities that exceed the \$1MM reporting threshold. Borrowers associated with non-graded Non-Purpose Loans and non-graded Loans for the Purpose of Purchasing and Carrying Securities are frequently Wealth Management (Private Client Group) borrowers and oftentimes Trust entities, which per current FR Y-14Q H.1 (Corporate Loan) reporting instructions, would require the reporting of obligor financials (fields 54 – 82), reported on a trailing twelve month basis. Obligor financials for these types of borrowers are generally not collected and thus not readily available for reporting, particularly with a proposed December 31, 2015 effective date for reporting. Current business practices will need to be amended in order to collect obligor financials for borrowers of these types of loans. In addition, reporting companies may only collect obligor financials on loans that are internally graded, and, therefore, would not have spread financials to report on scored/managed loans.

#### e. New Credit Facility Type Values

The FSR requests additional definition and details around the use of the new “Fronting Loan” and “Swingline” credit facility types.

i. Swingline and LC Fronting exposure are components/limits of other facilities that would also be Revolving credits of some type. Is the request to flag facilities as a Swingline or LC Issuance limit instead of flagging them as Revolvers? If so, how should we handle facilities that have both a Swingline and LC Issuance limit?

ii. Please clarify the appropriate credit facility type value (Fronting Loan, Swingline or other value) to assign to the following two examples: (1) LOB has a process in place to fund or advance the customer record prior to settling with participants. There can be a 1-2 day lag in settlement; (2) LOB has a process to receive payments on customer record prior to disbursing to participants. There can be a 1-2 day lag in settlement.



f. New Credit Facility Purpose Code Values

i. What is meant by “Non-purpose Margin Lending?” How does this differ from “Other non-purpose lending?”

ii. What types of loans would be considered to be “bridge financing?” Would this only include real estate financing loans? Are there maximum terms or other structural aspects of a transaction that would deem it to be “bridge financing?” How does this new purpose code relate to the “mini-perm” loan purpose recently added to the CRE schedule?

g. Revised Participation Flag Values

i. The listed revised values seem to speak to syndications but the description in the instructions indicates the need to capture this information for both Participation and Syndications. Please confirm.

ii. The proposal expands the option of the Participation Flag to the existing H.1 CIL schedule field #34 and H.2 CRE schedule field #7 to include the Shared National Credit (SNC) program. Some respondents are classified as expanded reporters and, therefore, are subject to a broader data collection referred to as “Large Corporate Syndicated Credit” (LCSC). The LCSC has the same \$20 million global commitment threshold as SNC does, but expands the collection to include credits with at least two member institutions, regardless of regulatory status. The SNCs are, therefore, a subset of the larger LCSC data collection. Therefore, we recommend that all references to SNCs in the proposal be clarified to include all LCSC eligible credits as well for respondents that are classified as expanded reporters

h. Credit Rating Agency Equivalent Rating and Credit Rating Agency

The Corporate Loan Schedule (H.1) and CRE Schedule (H.2) published on the Board’s web site include two new fields for reporting companies related to report credit rating agency equivalent ratings and agency name. However, there is no reference to these new fields in the Notice or any indication as to when these changes would be effective. Moreover, the instructions ask reporting companies to provide the credit rating agency equivalent rating for the company’s internal rating of the obligor. Would not the Board want the credit rating agency equivalent rating for a company’s internal rating of an entity when the entity overrides the obligor as the primary source of repayment on the loan?

**C. Proposed Changes to FR Y-14M**

1. Schedule A (First Lien)

*Proposed Change*

The Board is proposing to: (1) add two items – Serviced by Others Flag and Reporting As of Month; and (2) add two options to the Mortgage Insurance Company item

to more consistently identify companies within and across respondents. These changes would be effective December 31, 2015.

*FSR Comment*

Regarding the addition of the SBO Flag: Given that the title of this field is 'SBO Flag,' we believe that the options for this field have been inadvertently reversed in the proposed instructions. If the loan is Serviced By Others, we feel the allowable value should show as a "Y," but if the loan is serviced by the BHC, it should be an "N." Currently, the proposed instructions has these options reversed (SBO Flag = Y if serviced by BHC, but N if actually SBO).

2. Schedule B (Home Equity)

*Proposed Change*

The Board is proposing to: (1) add two items – Serviced by Others Flag and Reporting As of Month; and (2) add the item Payment Type at the End of Draw Period and an option to the Modification Type item to capture the differing risk characteristics based on payment type set on the loan after the draw period has ended. These changes would be effective December 31, 2015.

*FSR Comment*

We support the addition of the "Serviced by Others" flag. However, the reporting instructions for Modification Type state "This line item should be populated for any loan that is currently operating under modified terms and identifies the specific terms that were altered *through loss mitigation efforts*." (emphasis added). Home Equity line renewals may be processed either through loss mitigation efforts or through servicing-related efforts. It is unclear from the use of the Modification Type field if the Board's intention is to capture only Home Equity line renewals through loss mitigation efforts or if the Board expects all line renewals to be reported through the use of the Modification Type field.

Additionally, regarding the addition of the SBO Flag: Given that the title of this field is 'SBO Flag,' we believe the options for this field are inadvertently reversed in the proposed instructions. If the loan is Serviced By Others, we feel the allowable value should show as a "Y," but if the loan is serviced by the BHC, it should be an "N." Currently, the proposed instructions has these options reversed (SBO Flag = Y if serviced by BHC, but N if actually SBO).

3. Schedule B (Home Equity)

*Question*

The Board has requested information on the collection of data related to the performance of a first lien that is related to a junior lien reported on FR Y-14M Schedule B. Specifically, the Board has asked "What standards could be established that would make this item easier to report (e.g., use of credit bureau scores as proxy, use of external vendors to procure data, establish threshold limits if the junior lien portfolio is below a certain limit).

#### *FSR Comment*

We appreciate the Board recognizing the difficulty and cost burden for reporting companies in providing this data on a monthly basis. Even though the Board has only requested feedback for the Performance of First Lien that is related to a Junior Lien, the FSR requests that the Performance of Junior Lien within Schedule A as well as the Performance of First Lien within Schedule B be considered together within this context.

FSR members recognize the need to manage risk appropriately defined within the ALLL guidance, stated within SR 12-3 "Interagency Guidance on Allowance Estimation Practices for Junior Lien Loans and Lines of Credit," but this guidance does allow for institutions to monitor their portfolio by using other means. Specifically, the industry references SR 12-3, (1) "Institutions should consider all reasonably available and relevant information in the allowance estimation process, including information obtained for credit risk management purposes." By utilizing existing credit risk management processes and existing ALLL estimation processes, we believe the need for this data is mitigated by data already being collected.

We recommend that these two fields be removed from the aforementioned FR Y-14M collections and that the Board utilize the Current Credit Bureau Score, which is already being collected/reported, to monitor any deterioration for evaluating a loans/lines probability of default (PD). The industry believes that effective risk management practices can be followed by utilizing this metric because the inherent risk is mitigated by an effective and timely refresh score process. The timing lag between retrieving the past due information on a First Lien or Junior Lien and the effect within a FICO score being lowered is virtually nonexistent. When a First Lien or Junior Lien is past due or in default, the result is being captured within the borrower's FICO score declining in a very timely manner, thus resulting in a higher PD/EL estimation. In addition, the use of vendor acquired past due information in this context has been found to not always be reliable to the industry because the missing rate of information is much greater than the Board established thresholds for the edit checks associated with these two fields. Again, the need to collect this information is redundant to collecting the Current Credit Bureau Score because the risk should be already accounted for within the institutions ALLL processes and the FSR recommends the Board utilize the Current Credit Bureau Score to its full extent.

The Board also references utilizing a certain threshold limit for the Junior Lien portfolio. FSR reporting banks believe this arbitrary limit will not be effective because this risk is already being captured within the Current Credit Bureau Score, regardless of the size of the portfolio. Therefore, FSR recommends that the Board evaluate the measure of change within a borrower's FICO score when capturing data related to potential loan defaults.

#### **IV. PROPOSED ATTESTATION REQUIREMENT**

The Board has proposed that, effective June 30, 2016, the CFO (or an equivalent senior officer) of a Large Institution Supervision Coordinating Committee (LISCC)

respondent attest that the FR Y-14 reports are prepared in conformance with instructions. Additionally, the CFO (or an equivalent senior officer) would be required to attest that: (1) he or she is responsible for the internal controls over the reported data and that the data is materially correct to the best of his or her knowledge; (2) the controls are effective and include those practices necessary to provide reasonable assurance as to the accuracy of the data; and (3) the controls are audited annually by internal audit staff or compliance staff, and are assessed regularly by management. The CFO (or equivalent senior officer) also would be required to agree to report material weaknesses in the internal controls and any material errors or omissions in the data submitted as promptly as identified.

The Board has explained that this attestation requirement is needed to address “material inaccuracies” in the reported information as a result of “deficiencies in BHCs’ internal control environment.”<sup>18</sup> The Board also has determined that the FR Y-14 reports “are sufficiently mature to support the attestation.” We disagree with both of these conclusions. Inaccuracies in data are largely due to frequent changes in reporting requirements, insufficient time to comply with changes, and continuing problems with edit checks. Moreover, the continuing changes in the reporting requirement indicate that this reporting process is still evolving, and is far from mature.

We also are concerned about the absence of a definition of “materiality” in the proposal. As noted above, the proposal requires a CFO to attest that the data submitted is materially accurate. The lack of a definition requires each covered respondent to make an individual determination on materiality and that determination may not be consistent with Board expectations or determinations made by other respondents. If the Board decides to keep this attestation requirement, we recommend that it provide greater clarity around materiality.

Furthermore, the proposed time frame for compliance is insufficient to accommodate the systems and policy changes needed to permit attestation. While large bank holding companies have adopted the COSO framework for assessing controls for financial reports, one major consulting firm has estimated that it would take a company about 15 months to implement the controls necessary to assess risk information.<sup>19</sup> The need for additional time to implement this proposal also is demonstrated by the status of the Basel Committee’s Principles for effective risk data aggregation and risk reporting (“Basel 239”). Those principles are scheduled to take effect in January 2016, but reportedly most banks are far from meeting that deadline.<sup>20</sup>

Given these concerns, we urge the Board not to move forward with the attestation requirement. Instead, we urge the Board to adopt the recommendations contained in this letter. We believe that the adoption of those recommendations, especially our recommendations related to the frequency of changes and the time period for

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<sup>18</sup> 80 Fed. Reg. 55622, Sept. 16, 2015.

<sup>19</sup> “Matching SOX? CFO Attestation for Stress Tests”, Regulatory Brief, Price Waterhouse Coopers, October 2015.

<sup>20</sup> Id.

implementing changes, would address the Board's concerns about the quality and utility of the data submitted in the FR Y-14 reports.

## **V. ESTIMATE OF THE BURDEN OF INFORMATION COLLECTION**

The Notice invites comment on the Board's estimates of the annual reporting hours and average hours per response. Those estimates are detailed in OMB's Supporting Statement related to the Notice.<sup>21</sup> FSR members find, however, that the Board's estimates are substantially lower than the actual hours needed for most institutions to adequately respond to the requirements of the FR Y-14 collection. This finding is based upon information provided by eight FSR members. While this is a limited sample of all reporting companies, the data represents a good faith effort to calculate the actual burden imposed by this reporting process. As noted below, we believe that the actual burden of this data collection provides support for our recommendations for reforming this process, which are presented in earlier sections of this letter. As part of our on-going dialogue with Board and Reserve Bank staff we would welcome the opportunity to engage in a detailed discussion about the Board's methodology for calculating its estimates and our methodology for calculating actual burden.

### **A. The Board's Estimates**

The total current annual burden for FR Y-14A/Q/M schedules is estimated to be 774,937 hours and with the changes proposed in the Notice this estimate would increase by 54,924 hours to 829,861 hours. The increase in the burden is primarily due to the proposed attestation requirement. The current total annual burden hours for the FR Y-14A is estimated to be 71,709 hours and with the proposed revisions this estimate would decrease by 1,056 hours for a total of 70,653 hours. The decrease is due to the removal of Schedule A.2.c (ASC 310-30). The current total annual burden hours for the FR Y-14Q is estimated to be 220,468 hours and with the proposed revisions would increase by 6,732 hours for a total of 227,200 hours. The increase is primarily due to the changes to Schedules B (Securities) and L (Counterparty). The current total annual burden hours for the FR Y-14M is estimated to be 446,760 hours and with the proposed revisions would increase by 3,300 hours for a total of 450,060 hours.

The Board also has estimates for annual on-going automation burden (for existing respondents) and implementation for new respondents. The changes proposed in the Notice are estimated to increase this burden by 54,924 hours to 829,861 hours. The increase in the burden is primarily due to the proposed attestation requirement.

### **B. FSR Survey of Actual Reporting Burden**

The FSR solicited information from its members to assess the Board's estimate of

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<sup>21</sup> OMB Supporting Statement for the Capital Assessments and Stress Testing information collection (FR Y-14A/Q/M; OMB No. 7100-0341); [http://www.federalreserve.gov/reportforms/formsreview/FRY14A\\_FRY14M\\_FRY14Q\\_20151028\\_omb.pdf](http://www.federalreserve.gov/reportforms/formsreview/FRY14A_FRY14M_FRY14Q_20151028_omb.pdf)

the reporting burden associated with the collection and the submission of the FR Y-14 schedules. Eight FSR member companies submitted information on the actual burden incurred in connection with the FR Y-14 process. Other companies expressed interest in participating, but were not able to collect the needed information before the close of the comment period. The initial results of our survey indicate that the Board's estimates of the reporting burden materially underestimate the actual burden imposed in preparing and submitting the FR Y-14 data, in most cases the actual burden is many times the burden estimated by the Board.

The sizable difference between the Board's estimate and the reporting burden actually incurred by FSR members provides additional support for our recommendations related to the frequency of changes to the reporting instructions and the effective dates for changes. Our survey data shows that the current process has imposed a significant burden on reporting companies, which is exacerbated by frequent changes in the schedules and short implementation periods. We urge the Board to reevaluate its estimate of the burden of this data collection requirement, and adopt the recommended changes to this process that are outlined in this letter in order to reduce the reporting burden.

#### 1. FR Y-14A Schedule

Table 2-A compares the Board's estimate of the annual reporting hours per respondent with the average annual reporting hours estimated by FSR member companies for FR Y-14A reports. To give the Board a more complete view of the effort and resources required to file this report, this table displays the survey results two ways:

(1) An "all-in" estimate. This estimate includes stress test model development and back testing, model control validation, scenario development, and governance. Our "all-in" estimate is based on data supplied by four FSR members, but projected to all 33 reporting companies.

(2) A "publishing only" estimate. This estimate is based upon data supplied by the other four reporting companies that participated in the FSR survey, but includes only the hours associated with publishing the schedules. Again, the data has been projected for all reporting companies.

Our estimate of the "all-in" burden for reporting the FR Y-14A is almost 90 times the Board's estimate; in the second "publishing-only" estimate, the burden is still more than 3 times the Board's estimate.

Table 2-A  
**FR-Y 14 A Reporting**

	<b>Board Estimate of Annualized Burden</b>	<b>FSR “All-In” Estimate of Actual Burden (4 Companies)</b>	<b>FSR “Publishing Only” Estimate of Actual Burden (4 Other Companies)</b>
<b>Total Estimated Reporting Hours (Annual)</b>	70,653	6,344,415	231,132
<b>Avg. Estimated Hours Per Respondent</b>	2,141	192,255	7,004
<b>Total Estimated Hours for FSR Responding Banks</b>		769,180	28,016

2. FR Y-Q/M Schedules

Table 2-B compares our survey estimates with the Board’s estimates for the FR Y-Q and M schedules. In our survey we divided the FR Y-14Qs into two categories: loans and non-loans. The loans category includes the following five schedules: Wholesale, Retail, Mortgage Servicing Rights Valuation, Supplemental, and Balances. The non-loans category includes the Securities, PPNR, Trading, Operational Risk, Retail FVO/Held for Sale, Counterparty, Regulatory Capital Transitions, and Regulatory Capital Instruments schedules. This table includes a column that shows the multiple of the reporting burden the Board estimated compared to the Roundtable’s projections for the 33 reporting banks.

Table 2-B  
**FR Y-14 Q/M Reporting**

	<b>Board Estimate of Annual Burden</b>	<b>FSR Estimate of Actual Burden (8 Companies)</b>	<b>FSR Estimate of Actual Burden Projected for All Reporting Companies</b>	<b>FSR Multiple of Board Estimate</b>
<b>FR-Y 14Q (Loans) Total Hours</b>	25,968	187,908	780,000	30X
<b>FR-Y 14Q (Loans) Average Respondent Hours</b>	787	23,488		
<b>FR-Y 14Q (Non- Loans) Total Hours</b>	201,100	104,935	430,000	2.1X

	<b>Board Estimate of Annual Burden</b>	<b>FSR Estimate of Actual Burden (8 Companies)</b>	<b>FSR Estimate of Actual Burden Projected for All Reporting Companies</b>	<b>FSR Multiple of Board Estimate</b>
<b>FR-Y 14Q (Non-Loans) Average Respondent Hours</b>	6,094	13,117		
<b>FR-Y 14M Total Hours</b>	450,060	227,574	940,000	2.1X
<b>FR Y-14M Average Respondent Hours</b>	13,638	28,447		
<b>On-Going Automation Revisions Total Hours</b>	15,840	59,075	240,000	15.2X
<b>On-Going Automation Revision Average Respondent Hours</b>	480	7,384		
<b>On-Going Audit and Review Total Burden Hours</b>	23,040	52,986	220,000	9.5X
<b>On-Going Audit and Review Burden Hours Per Respondent</b>	2,560	6,623		

### 3. Attestation Requirement

Table 2-C compares the Board's estimate of the reporting burden for the proposed attestation requirement with burden estimated by FSR member companies. The FSR estimate is based upon data supplied by four FSR member companies including two non-



LISCC institutions. We use these results to extrapolate the possible burden of the current attestation proposal to all LISCC.

Table 2-C  
**Attestation**

	<b>Board Estimate</b>	<b>FSR Estimate of Burden (4 Companies)</b>	<b>FSR Estimate of Projected Burden for All LISCC Companies</b>	<b>FSR Multiple of Board Estimate</b>
<b>Attestation Implementation Total Hours (LISCC Institutions)</b>	43,200	2,864,500	6,450,000	149X

## **VI. PROPOSED DATA SHARING WITH OFR**

The Board is proposing to share the FR Y-14 data sets with OFR. The Board also has stated that the sharing of this information will not be deemed to be a waiver of any privilege applicable to the information, including supervisory privilege.<sup>22</sup> We have no objection to sharing the FR Y-14 data with OFR, as long as all privileges remain in effect and the confidentiality of individual institution data is preserved. However, we also recommend that OFR publish *aggregate* summaries of the data so reporting companies, and the public, can gain insights into industry trends and developments. We believe that the public disclosure of such data will enhance transparency into trends and developments within the respondent banks, and that this greater transparency will promote greater financial stability over time.

Sincerely,



Richard Foster

## **ATTACHMENTS**

Attachment A: Continuing the FR Y-14 Data Dialogue (October 23, 2015)

Attachment B: FR Y-14 Edit Check Review (September 24, 2015)

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<sup>22</sup> Id.

**COPY (WITHOUT ATTACHMENTS):**

Janet L. Yellen  
Chair  
Federal Reserve Board

Stanley Fischer  
Vice Chairman  
Federal Reserve Board

Daniel K. Tarullo  
Governor  
Federal Reserve Board

Jerome H. Powell  
Governor  
Federal Reserve Board

Lael Brainard  
Governor  
Federal Reserve Board

Shagufta Ahmed  
OMB Desk Officer  
Office of Information and Regulatory Affairs  
Office of Management and Budget

Richard Berner  
Director  
Office of Financial Research  
U.S. Department of the Treasury



FINANCIAL  
SERVICES  
ROUNDTABLE

# Continuing the FR Y-14 Data Dialogue



Discussion Draft  
Washington, D.C.  
October 23, 2015

# Today's Agenda



<b>Introductions</b>	<b>4</b>
<b>Goals and Objectives</b>	<b>6-7</b>
<b>Status Review and Discussion of Specific Recommendations</b> <ul style="list-style-type: none"><li>• Improving Communications</li><li>• Edit Checks</li><li>• Process Improvements/Timing</li><li>• Inconsistencies</li></ul>	<b>9-12</b> <b>13-18</b> <b>19-22</b> <b>23-24</b>
<b>Preliminary Feedback Regarding Proposed Changes</b>	<b>26</b>
<b>Next Steps / Future Meetings</b>	<b>28</b>
<b>Appendices</b> <ul style="list-style-type: none"><li>• Appendix A: SDLC Timeline</li><li>• Appendix B: XSD Enhancement</li></ul>	<b>30</b> <b>31</b>



## Introductions



## Participants (1/2)

### Federal Reserve

Board – Information Technology/Statistics	Lisa Bell, Kassandra Quimby, Virginia Wall, Langston Shaw, Laura Stash
Board – Banking Supervision and Regulation	Lisa Ryu, Nawsheen Rabbani, Phillip Basil, Laura McGaughey, Todd Vermilyea, Laurie Priest, Cynthia Ayouch
Board – Office of Chief Data Officer	Michael Kraemer, Nuha Elmaghrabi, Richard Palmer
Board – Legal	Benjamin McDonough, Julie Anthony
Federal Reserve Bank of New York	Ken Lamar, Brian Osterhus
Federal Reserve Bank of Philadelphia	Larry Cordell, Vidya Shenoy, Andrew Kish, Chellappan Ramasamy





## Participants (2/2)

### Reporting Banks, FSR, Advisers

Steven Brazzell; Jacob Stone	Ally Financial
Jack Bai; Amy Eccleston	Bank of America
Randy Nissen; Cindy Vasicek	Bank of the West
Craig Riffe	BB&T
Andrew Busby	BBVA Compass
Kent Luken	BMO Harris Bank
Gi Lee	BNP Paribas
Matti Jalakas; Jason Weisman	Citigroup
Mark Fontana	Comerica
Mike Deckert	Fifth Third Bank
Terence Donnelly	Goldman Sachs
Thomas Ricigliano; David Zolnowski	M&T Bank
Denise Pieck	Morgan Stanley
Mohammad Jafar	MUFG Union Bank
Baker Cannada	Regions
Eleanore C. Anderson Bell; Timothy Dexter; Charles Harris	TD Bank
Ben Etzkorn; Jim Flaa	US Bank
Bo Bika; Amy Dorn; Mingming Jang; Rowdy Jones	Wells Fargo
Shannon Drage; David Lapadat; Kristopher Roets; Kevin Thurgood	Zions
Rich Foster; Robert Hatch	Financial Services Roundtable
Ken Cassidy	Protiviti
Jim Sivon	Barnett, Sivon & Natter
Greg Wilson	Wilson Consulting



## Goals and Objectives





## We share one common goal

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The continuing goal of this FSR FR Y-14 Data Working Group and Federal Reserve dialogue is to enhance the quality and integrity of risk reporting data submitted to the Federal Reserve and meet the evolving data needs in a responsive, efficient, and risk-sensitive way.

- The collection, analysis, validation, and reporting of accurate risk reporting data is an ongoing, iterative, and evolving process among finance and treasury groups, risk management, and information technology groups at reporting banks as well as between the banks and the Board.
- Enhancing the current process and working collaboratively through constructive and regular engagement on issues of mutual concern will yield benefits to both the Federal Reserve and reporting banks.



## Objectives of today's meeting

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- Continue the collaborative dialogue on issues of mutual interest identified in the current FR Y-14 data submission process and recommended improvements.
- Clearly communicate our priority concerns to the Federal Reserve:
  - Continue to reduce the frequency of changes to the FR Y-14 schedules; and
  - Allow a minimum of **6 months** between finalization of reporting and technical requirements and the effective reporting date of the schedule(s) impacted by the requirements.
- Review and discuss the status of specific, actionable recommendations to improve the FR Y-14 reporting process, including progress to date, additional considerations, and immediate/practical solutions for:
  - Improving Communications;
  - Edit Checks;
  - Process Improvements/Timing; and
  - Inconsistencies.
- Discuss the new proposed changes, including the new attestation requirement.
- Discuss next steps for the FIs and the Federal Reserve.



## **Status Review and Discussion of Specific Recommendations**

# Improving Communications

David Zolnowski and Tom Ricigliano



## Theme #1: Improving Communications

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Advanced Notice of Proposed Schedule Changes</b>	Engage the Bank Holding Companies (BHCs) earlier in the planning process when changes to FR Y-14 reporting are being considered.	Revised recommendation. Meetings were held in early 2015 regarding proposed changes in the FR Y-14M schedules. We believe these were productive and will lead to a smoother transition of the changes proposed that are effective 12/31/15.	None.	Continue upon the success of the 14M and expand to all other schedules as well.
<b>Calendar</b>	Develop and maintain a calendar to inform BCHs of filing due dates (e.g., final instructions, FAQs, publish dates), as well as expected deadline for FRB to provide updates to technical specifications and FAQ documents. This calendar should also incorporate meetings for discussion of changes in schedules (previously discussed). New / revised instructions should be published on the dates established per the calendar.	No progress to date.	None.	Agree or Disagree that this is a viable option. If viable, establish an implementation date and put into practice.



## Theme #1: Improving Communications

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Reporting Instructions and Technical Specifications</b>	<p>Publish technical specifications (Data Dictionary, XSDs, Edit Checks, XML templates, etc.) in tandem with proposed or final reporting instructions in order to:</p> <ul style="list-style-type: none"> <li>• Give BHCs the opportunity to review new or revised guidance as a whole, identify any potential conflicts or inconsistencies, provide feedback and/or seek clarification in a timely fashion.</li> <li>• Give technology resources at BHCs a chance to be proactive.</li> </ul> <p>Reporting instructions should incorporate other forms of published guidance, such as citing specific FAQs that are both relevant and resolved, or updating the instructions to include that guidance.</p> <p>All forms of published guidance and reference materials should be version-controlled to facilitate clear and easy Q&amp;A between BHCs and FRB/POC.</p>	<p>Revised recommendation.</p> <p>No progress to date.</p> <p>BHCs continue to receive new and/or revised technical specifications on a lag versus the reporting instructions. This often occurs late in the reporting cycle, as an example, for the FR Y-14Qs, on 7/13 and 8/5 for 2015 Q2 due on 8/17, or for FR Y-14A DFAST, on 5/20, 6/15 and 6/29 for 2015 Q1 due 7/6.</p> <p>FRB has begun centralizing FAQs on IntraLinks.</p> <p>FRB has implemented version controls within the technical specifications.</p>	<p>BHCs have found inconsistencies between technical specifications and reporting instructions which have caused confusion and increased Q&amp;A. This can lead to rework.</p> <p>Ensure all guidance is provided to BHCs as soon as it becomes available.</p>	<p>Understand why there is a lag in publishing technical specifications.</p> <p>Explore ways to improve the current process to align the publication dates of reporting instructions and technical specifications.</p>





## Theme #1: Improving Communications

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Effective and Efficient Way to Obtain Clarification on Reporting Instructions</b>	<p>Determine a way to enhance communication between the Fed and BHCs to obtain clarification on reporting instructions, suggestions could be:</p> <ul style="list-style-type: none"> <li>• Direct contact to the individual Fed SMEs for each portfolio.</li> <li>• Periodic meetings between SMEs and BHCs for clarification.</li> <li>• Enhancements to FAQ process, including: <ul style="list-style-type: none"> <li>○ More transparency in process.</li> <li>○ Tracking numbers provided, and direct access to real-time status.</li> <li>○ Mutually agreeable Service Level Agreements (SLAs) for response.</li> <li>○ Searchable database for FAQs to look for previously submitted questions.</li> <li>○ Ability to send a confidential FAQ.</li> </ul> </li> </ul>	<p>Revised recommendation.</p> <p>Minor improvements in FAQ process to date.</p>	<p>There is a feeling in the industry that the decrease in FAQs submitted does not necessarily signal that the FR Y-14 process should be considered “mature”, but rather shows a lack of confidence in the current FAQ process.</p>	<p>Continue to work together to find a solution to better enhance communication.</p>



## Theme #1: Improving Communications

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Submission Confirmation</b>	<p>FRB/Point of Contact (POC) should confirm receipt of all files submitted by BHCs, particularly:</p> <ul style="list-style-type: none"> <li>• Upon receipt of FR Y-14 submission files.</li> <li>• Upon determination that submission files were loaded successfully to the FRB system.</li> <li>• Upon receipt of BHC's Respondent Edit Report (RER) files.</li> <li>• Upon determination that BHC's RER files were loaded successfully to the FRB system.</li> <li>• Upon determination that FRB has reviewed all RER files and no further action is needed for the reporting period.</li> </ul>	<p>Revised recommendation.</p> <p>Unless FRB/POC is advised by BHC to look for recently submitted files in IntraLinks, there is no communication beyond an IntraLinks update log which is provided to BHCs after the upload completes.</p>	<p>Confirmation process should apply to any and all files that FRB receives from BHC.</p> <p>An automated process, similar to that used for e-filing income tax returns, could provide BHCs a confirmation and also provide a status, for example, "Accepted / Conditionally Accepted / Pending Successful Load to FRB / Pending Syntax Edits / Pending Review".</p> <p>POC should also manually confirm receipt of documents sent via FR Secure Message Center.</p>	<p>Institute an automated process to provide BHCs instantaneous confirmation (possibly with current status) that their FR Y-14 deliverables have been received.</p> <p>FRB/POC feedback should be instantaneous and at a minimum indicate file name, file date and time, file size (KB), etc. and confirm that the file hand-off occurred without incident.</p>



## Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Request for Commentary</b>	Formalize the inclusion of technical instructions, including the data dictionary, edit rules, and XSD, for any commentary period that materially changes the FR Y-14 series of reports. This would allow the industry to provide appropriate feedback on feasibility and burden incurred with such proposed changes and decrease probability for edit check issues.	No progress to date.	None.	Data dictionary, edit rules, and XSD should be presented in a draft state to reporting banks for feedback during the formal commentary period for material changes to the FR Y-14 series of reports.





## Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Test File Load</b>	<p>For the FR Y-14Q and FR Y-14A:</p> <ul style="list-style-type: none"> <li>Federal Reserve environment should open 15 days before the submission due date to allow for test submissions.</li> <li>Test submissions are loaded and all edit checks are run against the test submission.</li> <li>All edit results are returned to the BHC within 24 hours of a test submission upload.</li> <li>The number of test submissions, the amount of edit fails, and any data anomalies within the test submission should not have any negative bearing on an institution's quantitative or qualitative results.</li> </ul>	No progress to date.	<p>Advantages/Gains:</p> <ul style="list-style-type: none"> <li>Allows for best possible submission, in terms of quality, on the date the submission is due.</li> <li>Provides the Federal Reserve a QA process/resource on newly defined edit checks as institutions are able to comment on unexpected/incorrect edit checks and the Federal Reserve can correct these edit checks before the submission due date.</li> <li>Saves institutions a considerable amount of resources and time by providing this functionality. For example, BlackKnight currently offers this same functionality for the FR Y-14M. The cost of this is \$8,000 per month with a onetime set up fee of \$8,000. Other more comprehensive vendor options are available for the FR Y-14Q and FR Y-14A that are significantly higher in cost.</li> </ul>	<p>Agree or Disagree that this is a viable option. If viable, establish an implementation date and put into practice.</p>



## Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Test File Load (Cont.)</b>	<p>For the FR Y-14M:</p> <ul style="list-style-type: none"> <li>Same as previous slide but environment opens 5 days before the submission due date.</li> </ul>	No progress to date.	<p>Possible Fed Concerns and Counterpoints:</p> <ul style="list-style-type: none"> <li>Concern: Provides an institution the ability to conceal inadequate processes and data quality issues.                             <ul style="list-style-type: none"> <li>Counterpoint: Onsite qualitative meetings after each CCAR provide the Federal Reserve the ability to review processes for robustness and validity.</li> <li>Counterpoint: Detailed Federal Reserve examinations for the FR Y-14Q/M provide the opportunity to review processes and issue findings/observations.</li> </ul> </li> </ul>	See previous slide.



## Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Enhanced XSDs</b>	Create and distribute enhanced XSDs that should remove the need for all syntax edit checks and reduce the quantity of validity edit checks run against each submission. Institutions should be required to validate against the published XSDs.	No progress to date.	If implemented, a significant amount of FR Y-14 edits can be removed. This will reduce the time and burden on the Federal Reserve required to maintain, distribute, and verify edit check results that are not needed. This would also reduce the burden on institutions to implement and maintain such edit checks as well as respond individually to each edit failure that occurs.	<p>Agree or Disagree to this approach. If in agreement, establish a date for implementation.</p> <p>The FSR will provide a sample enhanced XSD that eliminates the need for 1,923 edit checks for the FR Y-14A Summary schedule.</p>



## Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Tolerances</b>	Introduce tolerances/thresholds for any facility/loan level submission similar to what is done for the retail loan schedules on the FR Y-14Ms.	No progress to date.	There are legitimate business/product reasons for triggering edit checks. The internal auditors and external FRB examiners interpret the edit findings as errors while they are not.	Apply thresholds to facility/loan level edit checks, similar to what has been done by Black Knight for the FR Y-14M Mortgage/Home Equity templates.



## Theme #2: Edit Checks

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Validity and Scope of Edit Checks</b>	Review the validity and scope of the edit checks to account for situations where the rule(s) should not apply.	Population of edit checks of concern has been provided to the Federal Reserve several weeks in advance of this meeting as requested.	None.	Remove edit checks that are at issue or provide feedback identifying why the edit check should remain.

# Process Improvements/Timing

Mingming Jang and Amy Dorn



## Theme #3: Process Improvements/Timing

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Pre-Proposal Discussion for Major Changes</b>	Establish a process to proactively solicit BHCs' input and comment on potential major changes in reporting requirements, in order to better understand reporting feasibility and decrease probability of misinterpretation of requirement.	<p>The FRB reached out to this working group for comments in Dec. 2014 on potential Y14Q wholesale schedule changes.</p> <p>In April 2015, the FRB provided a preview of Y14M FL &amp; HE proposed item and solicited BHCs' feedback via this working group.</p> <p>Early high-level notification of 2015 proposal shared during Ask the Fed session in June 2015.</p> <p>In June 2015, the FRB provided a staff proposal for the changes in collection of loan level auto data. A draft data dictionary was provided to solicit BHCs' feedback from general and technical perspectives.</p>	This process can be expanded to include the other Y14 schedules.	Continue to proactively engage industry through this working group for input prior to issuing a proposal for significant instruction requirement changes. This allows the SMEs from the FRB and industry to communicate the business practice and exchange perspectives.



# Process Improvements/Timing

Mingming Jang and Amy Dorn



## Theme #3: Process Improvements/Timing

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Inquiries</b>	Establish a standard timeline for resolution for inquiries submitted to FRB. Depending on the complexity or specificity of the subject matter, a recommended timeline would be from 2-4 weeks.	No progress to date.	<p>The new process of distributing FAQs quarterly does not provide accurate lead time to respond to FAQs that may affect an institution. A more frequent schedule for FAQ distribution is recommended (i.e., every 4 weeks).</p> <p>Providing timely clarification on the instruction is essential to the quality of the report and to improve efficiency of report preparation.</p>	Set forth a formal agreement (i.e., SLA) with reporting banks that all inquiries will be responded to in a timely manner (e.g., within 2 weeks) and provide an escalation process for when responses are not received within an agreed upon timeline.

# Process Improvements/Timing

Mingming Jang and Amy Dorn



## Theme #3: Process Improvements/Timing

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
Changes	<p>Establish an agreed upon timeline for change requests to allow reporting banks adequate time to adhere to standard software development life cycles (SDLC). This includes writing requirements, establishing project timelines, update coding, mapping, validation, scheduling releases to production, testing and changes to affected reporting structures.</p> <p>A recommended minimum of six months or longer from a final rule, especially if changes affect multiple or complex fields, similar to instruction changes for the Y-9C submission. If major structural changes are requested (such as changing the Wholesale 14Q from a facility to a loan level submission or adding a peripheral collateral collection with linkages to the Corporate and CRE 14Q submissions) and significantly longer lead time, such as one year, would be recommended to accommodate these changes as many areas of the bank would need to be involved. (Refer to Appendix A).</p>	<p>A forum was convened to review changes to the Wholesale and Retail schedules.</p> <p>The latest proposal issued in Sep. 2015 has the proposed effective date extended to 1Q2016 for Wholesale Y14Q schedules.</p>	<p>A more clearly defined plan for when (quarter) changes will be effective, in order to enhance transparency into which fields will be required, and dates, in order for BHCs to enhance lead time and quality control.</p> <p>Every request for clarification submitted during the comment period needs to be fully addressed in the final instructions or supplemental documentation allowing BHCs to report their data in accordance with the instructions with clarity.</p> <p>BHCs are concerned about the timing since the FAQ process did not provide resolutions to all questions prior to the filing.</p>	<p>Provide BHCs with adequate timing (i.e., minimum of 6 months from publication of final instruction) to implement changes, this includes providing advance notice to BHCs when there will be changes/revisions.</p>



# Process Improvements/Timing

Mingming Jang and Amy Dorn



## Theme #3: Process Improvements/Timing

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Acquisitions and Historical Data</b>	Consider good faith efforts by BHCs in populating static and/or historical data on acquired portfolios and grant exemptions on data gaps as appropriate. The information systems of acquired portfolios tend not to house all of the attributes required for CCAR reporting.	Updated recommendation.	Define the requirement for BHCs (non-first time filing companies) providing historical data on acquired portfolios to the data available in the acquired portfolio.	Formalize a process to incorporate historical data from acquisition into the edit check process.  Provide clarity on the requirements for reporting of historical data (i.e. Net Operational Income at Origination, Value at Origination, etc.)
<b>Concurrent Specification Changes</b>	Consider all components of a change holistically so that updated rules or instructions are provided and agree with their technical specifications and edit checks.	No progress to date.	Consider establishing a standard 14A edit check fail response timeline which is consistent with time necessary to report edit rule failures to the BHCs. Recommend a 2 business day response window.	Ensure consistent information is provided across various instructions and documents.  Lengthen the response time for the 14A edit check fails to 2 business days.



## Theme #4: Inconsistencies

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Data Dictionary</b>	Establish FR Y-14 data dictionary leveraging industry standards (e.g., MISMO / FHA). This appears to be occurring with the introduction of the 14A XML MDRM; however, the consolidation of how schedule data points are referenced needs to be considered (e.g., 14A Summary Schedule MDRM vs. 14Q PPNR technical codes vs. 14QPPNR line item codes vs. 14Q Retail schedule column names).	No progress to date.	Include data dictionary in all proposed instruction changes. This should be produced in a draft state so that BHCs can provide feedback to its accuracy.	Enhance usage of MDRMs across all schedules.  Coordinate with other regulatory agencies to ensure consistency for common data elements and consolidate those data elements into one data dictionary.  Establish consistency across data dictionary for Y-14Ms, Qs, and As.
<b>Coordination</b>	Collaborate and coordinate with other bank regulators / Office of Financial Research to determine standardized file formats for data submissions across the bank regulatory agencies.	No progress to date across all regulatory agencies; however, all FR Y-14Q technical instructions have been consolidated into one document.	Continue to emphasize the coordination with other regulatory agencies.	Improve coordination with other regulatory agencies which request similar, if not the same, data. For example, FRB and FDIC / OCC coordination on CCAR / DFAST submission file formats (XML vs Excel).  Number of technical instructions should be consistent quarter-to-quarter to ensure consistent reporting standard.



## Theme #4: Inconsistencies

	Initial Recommendation	Progress to Date	Additional Considerations	A Way Forward
<b>Use of XML</b>	Extend the use of the XSD and require all BHCs validate against the XSD before submitting their data.	No progress to date.	Approximately 6,000 edit checks (~80% of all 14A/Q edits) can be implemented within the XSD to ensure that the FRB receives data in the appropriate and expected format. This would also reduce personnel and system resource consumption at the FRB and at BHCs. (Refer to Appendix B)	Extend the usage of submission XSDs, requiring all BHCs to validate against the XSD before submitting their data: data types / restrictions; enumerations; max / min values; patterns.



## Preliminary Feedback Regarding Proposed Changes



## Proposed Changes: Preliminary Feedback for Discussion

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- FSR Comment Letter: In-process with an estimated submission by November 16, 2015.
- Timing of Changes: Request for a minimum of 6 months for implementation after final rule.
- Socialization of Changes: Socialization of proposed changes with industry for feedback.
- Specific Discussion Items (Note that additional detail on the below topics may be shared during this meeting based on further review and discussion by the attending financial institutions):
  - Attestation requirement;
  - Edit checks provided in advance;
  - Reporting of pipeline syndications;
  - Dispositions of corporate loans;
  - Changes to 14A schedule; and
  - Changes to C&I and CRE schedules.



## Next Steps





- Schedule and agree on dates for remaining quarterly meetings between the Federal Reserve and FSR FR Y-14 Working Group to continue the dialogue on issues surrounding FAQs, edit checks, timing, and inconsistencies that have been previously identified. Reminder of top two reporting bank priorities:
  - Continue to reduce the frequency of changes to the FR Y-14 schedules; and
  - Allow a minimum of **6 months** between finalization of reporting and technical requirements and the effective reporting date of the schedule(s) impacted by the requirements.
- Agree with the Federal Reserve to work on next steps around the recommendations for improving the edit checks discussed and previously provided in the Excel template.
- Discuss need for interim conference calls on targeted issues for deeper dives (e.g., resolving edit check issues, auto loan data collection, individual schedules).



## Appendices



# Appendix A: SDLC Timeline



SDLC process to systematically update reporting processes may take up to one year to fully implement depending on the request, system capabilities, and resource constraints.

## **Summary of Project:**

Produce a single counterparty gross credit exposure report using a specific data metric

## **Challenges in SDLC:**

- New configuration impacted current reports in production
- Configuration updates affected Risk Reporting Asset Category Codes
- Hard-coded logic had to be replaced with automatic configuration
- Configuration flags for all outbound processes had to be consolidated
- Facility Limits previously reported by Facility Owner Customer were updated to be reported by Primary Customer
- Configuration had to be updated to include data for Credit Default Reporting

Note: The SDLC process varies dramatically for less and more sophisticated changes; actual timelines may range from three months to one year or more.

## **Gross Credit Exposure - SDLC Timeline**

Phase / Objective	Time Required (Weeks)
Receive Request	
Planning Phase	4
Project definition	4
Write Business Requirements and Obtain Sign-off	6
Write Technical / Systems Requirements	10
System Build / Coding and Ongoing Clarification / System Testing	6
User Acceptance Testing	5
Approval and Deployment / Go-Live	5
Quality Control / Parallel Run	12
<b>Total</b>	<b>52</b>

# Appendix B: XSD Enhancement



The following are edit checks that can be moved into XSD (pre-submission validation).

Collections	Schedule	Syntax	Validity	Total
FR Y-14Q	Balance	176	0	176
	Counterparty	0	0	0
	FVO / HFS	46	0	46
	MSR Valuation Schedule	0	0	0
	OpRisk	29	33	62
	PPNR	288	474	762
	Regulatory Capital Instruments	51	38	89
	Regulatory Capital Transitions	348	149	497
	Retail	244	19	263
	Securities	43	29	72
	Supplemental	116	0	116
	Trading	0	0	0
	Wholesale	170	151	321
FR Y-14A	Summary	1877	1424	3301
<b>Total</b>				<b>5705</b>



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Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Actual	524	Syntax	If <> null, CASRN940 must be in Numeric (16,6)	If provided, ASC-4.9 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	525	Syntax	If <> null, CASRN941 must be in Numeric (16,6)	If provided, ASC-4.10 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	526	Syntax	If <> null, CASRN942 must be in Numeric (16,6)	If provided, ASC-4.11 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	527	Syntax	If <> null, CASRN943 must be in Numeric (16,6)	If provided, ASC-4.12 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	528	Syntax	If <> null, CASRN944 must be in Numeric (16,6)	If provided, ASC-4.13 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	529	Syntax	If <> null, CASRN945 must be in Numeric (6,4)	If provided, ASC-4.14 must be in Numeric (6,4)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	530	Syntax	If <> null, CASRN946 must be in Numeric (16,6)	If provided, ASC-5.1 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	531	Syntax	If <> null, CASRN947 must be in Numeric (16,6)	If provided, ASC-5.2 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	532	Syntax	If <> null, CASRN949 must be in Numeric (16,6)	If provided, ASC-5.4 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	533	Syntax	If <> null, CASRN950 must be in Numeric (16,6)	If provided, ASC-5.5 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	534	Syntax	If <> null, CASRN951 must be in Numeric (16,6)	If provided, ASC-5.6 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	535	Syntax	If <> null, CASRN952 must be in Numeric (16,6)	If provided, ASC-5.7 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	536	Syntax	If <> null, CASRN953 must be in Numeric (16,6)	If provided, ASC-5.8 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	537	Syntax	If <> null, CASRN954 must be in Numeric (16,6)	If provided, ASC-5.9 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	538	Syntax	If <> null, CASRN955 must be in Numeric (16,6)	If provided, ASC-5.10 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	539	Syntax	If <> null, CASRN956 must be in Numeric (16,6)	If provided, ASC-5.11 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	540	Syntax	If <> null, CASRN957 must be in Numeric (16,6)	If provided, ASC-5.12 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	541	Syntax	If <> null, CASRN958 must be in Numeric (16,6)	If provided, ASC-5.13 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	542	Syntax	If <> null, CASRN959 must be in Numeric (6,4)	If provided, ASC-5.14 must be in Numeric (6,4)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	673	Validity	CASK5610 = CASDQ279	IS-30 must equal IS-167.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The logic is correct however the Error_Message_Display description is not correct. It makes reference to the wrong worksheet.	
Actual	727	Quality	CASDP844 <> null.	CAP-51 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC did not make the election to opt out of the requirement to include most components of AOCI in common equity tier 1 capital for the period ending 3/31/2015 this line was not required.	
Actual	728	Quality	CASDP845 <> null.	CAP-52 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC did not make the election to opt out of the requirement to include most components of AOCI in common equity tier 1 capital for the period ending 3/31/2015 this line was not required.	
Actual	729	Quality	CASDP846 <> null.	CAP-53 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC did not make the election to opt out of the requirement to include most components of AOCI in common equity tier 1 capital for the period ending 3/31/2015 this line was not required.	

Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Actual	730	Quality	CASDP847 <> null.	CAP-54 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC did not make the election to opt out of the requirement to include most components of AOCI in common equity tier 1 capital for the period ending 3/31/2015 this line was not required.	
Actual	731	Quality	CASDP848 <> null.	CAP-55 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC did not make the election to opt out of the requirement to include most components of AOCI in common equity tier 1 capital for the period ending 3/31/2015 this line was not required.	
Actual	859	Quality	CASAN837 <> null.	ARWA-3 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	860	Quality	CASAN838 <> null.	ARWA-4 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	861	Quality	CASAN839 <> null.	ARWA-5 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	862	Quality	CASAN840 <> null.	ARWA-6 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	863	Quality	CASAN841 <> null.	ARWA-7 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	864	Quality	CASAN842 <> null.	ARWA-8 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	865	Quality	CASAN843 <> null.	ARWA-9 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	866	Quality	CASAN844 <> null.	ARWA-10 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	867	Quality	CASAN845 <> null.	ARWA-11 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	868	Quality	CASAN846 <> null.	ARWA-12 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	869	Quality	CASAN848 <> null.	ARWA-14 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Actual	870	Quality	CASAN849 <> null.	ARWA-15 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.



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Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Actual	1231	Interseries	If <> null, CASIP581 = (BHCK3123 (prior quarter))/1000	If provided, IS-68 must equal BHCK3123 for the quarter prior to D_DT divided by 1000.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Should be an allowance for minor rounding on Income Statement Worksheet  This edit check will always fail as the 14A value has three more decimal places than the Y9-C value after dividing by 1000.	Rounding noise / See other major themes.
Actual	1232	Interseries	If <> null, CASI3123 = BHCK3123 / 1000	If provided, IS-116 must equal BHCK3123 divided by 1000.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Should be an allowance for minor rounding on Income Statement Worksheet  This edit check will always fail as the 14A value has three more decimal places than the Y9-C value after dividing by 1000.	Rounding noise / See other major themes.
Capital - Projected	166	Validity	CPSK5610 = CPSDQ279	IS-30 must equal IS-167.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Should be an allowance for minor rounding on DTA Calculation.  The logic is correct however the Error_Message_Display description is not correct. It makes reference to the wrong worksheet.	Rounding noise / See other major themes.
Capital - Projected	218	Quality	CPSDP838 <> null.	CAP-42 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Projected periods are not required for CAP-42 on the Fed's form.	
Capital - Projected	227	Quality	CPSDP844 <> null.	CAP-51 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC did not make the election to opt out of the requirement to include most components of AOCI in common equity tier 1 capital for the period ending 3/31/2015 this line was not required.	
Capital - Projected	228	Quality	CPSDP845 <> null.	CAP-52 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC did not make the election to opt out of the requirement to include most components of AOCI in common equity tier 1 capital for the period ending 3/31/2015 this line was not required.	
Capital - Projected	229	Quality	CPSDP846 <> null.	CAP-53 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC did not make the election to opt out of the requirement to include most components of AOCI in common equity tier 1 capital for the period ending 3/31/2015 this line was not required.	
Capital - Projected	230	Quality	CPSDP847 <> null.	CAP-54 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC did not make the election to opt out of the requirement to include most components of AOCI in common equity tier 1 capital for the period ending 3/31/2015 this line was not required.	
Capital - Projected	231	Quality	CPSDP848 <> null.	CAP-55 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC did not make the election to opt out of the requirement to include most components of AOCI in common equity tier 1 capital for the period ending 3/31/2015 this line was not required.	
OTTI_MV	10	Quality	CASMN243 <> null.	OTTI-M-2 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	This is a shaded item on the Fed's form. Per the instructions, BHC's are not to report them.	
OTTI_MV	12	Quality	CASMN245 <> null.	OTTI-M-4 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	This is a shaded item on the Fed's form. Per the instructions, BHC's are not to report them.	
OTTI_MV	13	Quality	CASMN246 <> null.	OTTI-M-5 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	This is a shaded item on the Fed's form. Per the instructions, BHC's are not to report them.	
OTTI_MV	14	Quality	CASMN247 <> null.	OTTI-M-6 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	This is a shaded item on the Fed's form. Per the instructions, BHC's are not to report them.	
OTTI_MV	15	Quality	CASMN248 <> null.	OTTI-M-7 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	This is a shaded item on the Fed's form. Per the instructions, BHC's are not to report them.	
OTTI-Projected	8	Quality	CPSPN234 <> null.	OTTI-P-4 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Submitted numeric value and received edit check.	
OTTI-Projected	9	Quality	CPSPN235 <> null.	OTTI-P-5 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Submitted numeric value and received edit check.	
Projected	217	Syntax	If <> null, CPSAN837 must be in Numeric (16,6)	If provided, ARWA-3 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	218	Syntax	If <> null, CPSAN838 must be in Numeric (16,6)	If provided, ARWA-4 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	219	Syntax	If <> null, CPSAN839 must be in Numeric (16,6)	If provided, ARWA-5 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	220	Syntax	If <> null, CPSAN840 must be in Numeric (16,6)	If provided, ARWA-6 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	221	Syntax	If <> null, CPSAN841 must be in Numeric (16,6)	If provided, ARWA-7 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	222	Syntax	If <> null, CPSAN842 must be in Numeric (16,6)	If provided, ARWA-8 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	223	Syntax	If <> null, CPSAN843 must be in Numeric (16,6)	If provided, ARWA-9 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.



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Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Projected	445	Syntax	If <> null, CPSRN935 must be in Numeric (16,6)	If provided, ASC-4.4 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	446	Syntax	If <> null, CPSRN937 must be in Numeric (16,6)	If provided, ASC-4.6 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	447	Syntax	If <> null, CPSRN940 must be in Numeric (16,6)	If provided, ASC-4.9 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	448	Syntax	If <> null, CPSRN941 must be in Numeric (16,6)	If provided, ASC-4.10 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	449	Syntax	If <> null, CPSRN942 must be in Numeric (16,6)	If provided, ASC-4.11 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	450	Syntax	If <> null, CPSRN943 must be in Numeric (16,6)	If provided, ASC-4.12 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	451	Syntax	If <> null, CPSRN944 must be in Numeric (16,6)	If provided, ASC-4.13 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	452	Syntax	If <> null, CPSRN945 must be in Numeric (6,4)	If provided, ASC-4.14 must be in Numeric (6,4)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	453	Syntax	If <> null, CPSRN946 must be in Numeric (16,6)	If provided, ASC-5.1 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	454	Syntax	If <> null, CPSRN947 must be in Numeric (16,6)	If provided, ASC-5.2 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	455	Syntax	If <> null, CPSRN949 must be in Numeric (16,6)	If provided, ASC-5.4 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	456	Syntax	If <> null, CPSRN951 must be in Numeric (16,6)	If provided, ASC-5.6 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	457	Syntax	If <> null, CPSRN954 must be in Numeric (16,6)	If provided, ASC-5.9 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	458	Syntax	If <> null, CPSRN955 must be in Numeric (16,6)	If provided, ASC-5.10 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	459	Syntax	If <> null, CPSRN956 must be in Numeric (16,6)	If provided, ASC-5.11 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	460	Syntax	If <> null, CPSRN957 must be in Numeric (16,6)	If provided, ASC-5.12 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	461	Syntax	If <> null, CPSRN958 must be in Numeric (16,6)	If provided, ASC-5.13 must be in Numeric (16,6)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	462	Syntax	If <> null, CPSRN959 must be in Numeric (6,4)	If provided, ASC-5.14 must be in Numeric (6,4)	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	845	Validity	CPSB2170 = CPSB2948 + CPSBG105	BS-131 must equal the sum of BS-142 and BS-151.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Error on Fed edit check  Should be an allowance for minor rounding on Balance Sheet.  Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+. Rounding noise / See other major themes.
Projected	846	Validity	Total CPSRP113 = Total CPSVP108 + Total CPSVP112	The summed Total of RR-A.3-1 must equal the summed Totals of RR-A.1-11 and RR-A.2-4.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Error on Fed calculation	



Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Projected	847	Validity	Total CPSRP129 = Total CPSVP124 + Total CPSVP128	The summed Total of RR-B.3-1 must equal the summed Totals of RR-B.1-11 and RR-B.2-4.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Error on Fed calculation	
Projected	848	Validity	Total CPSRP146 = Total CPSVP141 + Total CPSVP145	The summed Total of RR-C.3-1 must equal the summed Totals of RR-C.1-12 and RR-C.2-4.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Error on Fed calculation	
Projected	853	Quality	CPSIP525 <> null	IS-9 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	854	Quality	CPSIP526 <> null	IS-10 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	855	Quality	CPSIP528 <> null	IS-12 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	856	Quality	CPSIP529 <> null	IS-13 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	857	Quality	CPSIP530 <> null	IS-14 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	859	Quality	CPSIP533 <> null	IS-19 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	860	Quality	CPSIP534 <> null	IS-20 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	861	Quality	CPSIP536 <> null	IS-22 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	862	Quality	CPSIP537 <> null	IS-23 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	863	Quality	CPSIP538 <> null	IS-24 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	864	Quality	CPSIP540 <> null	IS-26 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	865	Quality	CPSIP546 <> null	IS-33 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	866	Quality	CPSIP549 <> null	IS-36 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	867	Quality	CPSIP550 <> null	IS-37 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.

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Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Projected	1054	Quality	CPSGN825 <> null	GRWA-26 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1056	Quality	CPSFA222 <> null	GRWA-28 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1058	Quality	CPSG3128 <> null	GRWA-29 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1059	Quality	CPSG8764 <> null	GRWA-31 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1060	Quality	CPSGN827 <> null	GRWA-32 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1061	Quality	CPSGN828 <> null	GRWA-33 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1062	Quality	CPSGN829 <> null	GRWA-34 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1063	Quality	CPSGN830 <> null	GRWA-35 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1064	Quality	CPSGN831 <> null	GRWA-36 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1065	Quality	CPSGN832 <> null	GRWA-37 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1066	Quality	CPSGN833 <> null	GRWA-38 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1067	Quality	CPSGN834 <> null	GRWA-39 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1068	Quality	CPSAN837 <> null	ARWA-3 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.  Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1069	Quality	CPSAN838 <> null	ARWA-4 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1070	Quality	CPSAN839 <> null	ARWA-5 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable.	Add logic to determine if subschedule is mandatory for the BHC.



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Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Projected	1123	Quality	CPSAN819 <> null	ARWA-66 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.  Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1124	Quality	CPSAN820 <> null	ARWA-67 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.  Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1125	Quality	CPSAN821 <> null	ARWA-68 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.  Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1126	Quality	CPSAN822 <> null	ARWA-69 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.  Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1127	Quality	CPSAN823 <> null	ARWA-70 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.  Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1128	Quality	CPSAN824 <> null	ARWA-71 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.  Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1129	Quality	CPSAN825 <> null	ARWA-72 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.  Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1130	Quality	CPSAN826 <> null	ARWA-74 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.  Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable. The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1131	Quality	CPSAJ152 <> null	ARWA-75 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the D.3 Advanced Risk Weighted Assets sub-schedule. That sub-schedule is not required data for certain BHCs.  Since the BHC is not an advanced approach BHC that has exited parallel, completion of the Advanced RWA worksheet was not applicable.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1132	Quality	CPSRP381 <> null	RB&L-1 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1133	Quality	CPSRP382 <> null	RB&L-2 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1134	Quality	CPSRP383 <> null	RB&L-3 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1135	Quality	CPSRP384 <> null	RB&L-4 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1136	Quality	CPSRP385 <> null	RB&L-5 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.



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Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Projected	1152	Quality	CPSRP408 <> null	RB&L-28 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.  Allocation of Loan balance by Vintage category for PQ6-PQ9 is not applicable for forecast periods PQ1-PQ5.	Amend edit to exclude testing PQ10+.
Projected	1153	Quality	CPSRP409 <> null	RB&L-29 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1154	Quality	CPSRP410 <> null	RB&L-30 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1155	Quality	CPSRP411 <> null	RB&L-31 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1156	Quality	CPSRP412 <> null	RB&L-32 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1157	Quality	CPSRP415 <> null	RB&L-35 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1158	Quality	CPSRP416 <> null	RB&L-36 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1159	Quality	CPSRP417 <> null	RB&L-37 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1160	Quality	CPSRP418 <> null	RB&L-38 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1161	Quality	CPSRP419 <> null	RB&L-39 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1162	Quality	CPSRP420 <> null	RB&L-40 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1163	Quality	CPSRP423 <> null	RB&L-43 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1164	Quality	CPSRP424 <> null	RB&L-44 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1165	Quality	CPSRP425 <> null	RB&L-45 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1166	Quality	CPSRP426 <> null	RB&L-46 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.

Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Projected	1167	Quality	CPSRP427 <> null	RB&L-47 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1168	Quality	CPSRP428 <> null	RB&L-48 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1169	Quality	CPSRP431 <> null	RB&L-51 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1170	Quality	CPSRP432 <> null	RB&L-52 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1171	Quality	CPSRP433 <> null	RB&L-53 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1172	Quality	CPSRP434 <> null	RB&L-54 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1173	Quality	CPSRP435 <> null	RB&L-55 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1174	Quality	CPSRP436 <> null	RB&L-56 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1175	Quality	CPSRP437 <> null	RB&L-57 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1176	Quality	CPSRP438 <> null	RB&L-58 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1177	Quality	CPSRP439 <> null	RB&L-59 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1178	Quality	CPSRP440 <> null	RB&L-60 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1179	Quality	CPSRP442 <> null	RB&L-62 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1180	Quality	CPSRP443 <> null	RB&L-63 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1181	Quality	CPSRP444 <> null	RB&L-64 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.  Allocation of Loan balance by Vintage category for PQ6-PQ9 is not applicable for forecast periods PQ1-PQ5.	Amend edit to exclude testing PQ10+.



Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Projected	1182	Quality	CPSRP445 <> null	RB&L-65 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1183	Quality	CPSRP446 <> null	RB&L-66 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1184	Quality	CPSRP447 <> null	RB&L-67 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1185	Quality	CPSRP448 <> null	RB&L-68 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1186	Quality	CPSRP450 <> null	RB&L-70 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1187	Quality	CPSRP451 <> null	RB&L-71 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1188	Quality	CPSRP452 <> null	RB&L-72 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.  Allocation of Loan balance by Vintage category for PQ6-PQ9 is not applicable for forecast periods PQ1-PQ5.	Amend edit to exclude testing PQ10+.
Projected	1189	Quality	CPSRP453 <> null	RB&L-73 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1190	Quality	CPSRP454 <> null	RB&L-74 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1191	Quality	CPSRP455 <> null	RB&L-75 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1192	Quality	CPSRP456 <> null	RB&L-76 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1193	Quality	CPSRP457 <> null	RB&L-77 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1194	Quality	CPSRP458 <> null	RB&L-78 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1195	Quality	CPSRP459 <> null	RB&L-79 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1196	Quality	CPSRP460 <> null	RB&L-80 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.



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Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Projected	1306	Quality	CPSRN949 <> null	ASC-5.4 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1307	Quality	CPSRN951 <> null	ASC-5.6 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1308	Quality	CPSRN954 <> null	ASC-5.9 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1309	Quality	CPSRN955 <> null	ASC-5.10 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1310	Quality	CPSRN956 <> null	ASC-5.11 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1311	Quality	CPSRN957 <> null	ASC-5.12 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1312	Quality	CPSRN958 <> null	ASC-5.13 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1313	Quality	CPSRN959 <> null	ASC-5.14 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	The field identified as Null is on the A.2.c ASC 310-30 sub-schedule. That sub-schedule is not required data for certain BHCs.	Add logic to determine if subschedule is mandatory for the BHC.
Projected	1349	Quality	CPSN4074 = CPSNQ022 - CPSNQ057	PPNR-Proj-13 must equal PPNR-NII-33 minus PPNR-NII-48.	FRY14A_2015Q1_Summary_Edits_20150629_V2	<p>This check compares NII on Projection Worksheet to NII worksheet. These two figures will not match exactly as the NII worksheet is a derived figure calculated as Balance x Average Rate and since average rate is limited to 4 decimals, we lose some granularity provided in the Projection Worksheet calculations.</p> <p>Fed Edit Check rounding incorrect</p> <p>Should be an allowance for minor differences caused by rounding of Balances and Yields as required per XML instructions.</p>	<p>Allow for a tolerance.</p> <p>Rounding noise / See other major themes.</p>
Projected	1352	Quality	CPSNQ161 <> null	PPNR-Proj-1B must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1353	Quality	CPSNQ162 <> null	PPNR-Proj-1C must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1354	Quality	CPSNQ163 <> null	PPNR-Proj-1D must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1355	Quality	CPSNQ164 <> null	PPNR-Proj-1E must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1356	Quality	CPSNQ165 <> null	PPNR-Proj-1F must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1357	Quality	CPSNQ166 <> null	PPNR-Proj-1G must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1358	Quality	CPSNQ167 <> null	PPNR-Proj-2 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1359	Quality	CPSNQ168 <> null	PPNR-Proj-3 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1360	Quality	CPSNQ169 <> null	PPNR-Proj-4 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1362	Quality	CPSNQ171 <> null	PPNR-Proj-5A must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.





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Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Projected	1452	Quality	CPSNQ255 <> null	PPNR-Proj-40 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1453	Quality	CPSNC216 <> null	PPNR-Proj-41 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1456	Quality	If CPSNQ038 <> 0 and CPSNQ038 / CPSNQ040 > .05, then CPSNQ983 <> null or 0 and CPSNQ984 <> null or 0.	If PPNR-NII-39 is not 0 and PPNR-NII-39 divided by PPNR-NII-41 is greater than 5%, then PPNR-NII-N3 text and financial must not be null or 0.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit check did not include all necessary MDRM codes  If you have more than one line of notes and some greater than 5% quarters have zeros or nulls for the first line, this will result in a false fail.	edit check should include CPSNQ985, CPSNQ986, CPSNQ987 and CPSNQ988.
Projected	1479	Quality	If CASNR044 = 'Y' and CPSNQ030 <> 0 or null, then CPSNQ048 > 0; if CPSNQ030 = null or 0, then CPSNQ048 = null or 0.	If CASNR044 equals Yes and PPNR-NII-35A is not null or 0, then PPNR-NII-43A should be greater than 0; if CASNR044 equals Yes and PPNR-NII-35A is null or 0, then PPNR-NII-43A must be null or 0.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Entry rounded to 0 per Data Dictionary, edit requires to be >0	
Projected	1487	Quality	CPSNP975 <> null	PPNR-NII-1 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1489	Quality	CPSNP977 <> null	PPNR-NII-2A must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1490	Quality	CPSNP978 <> null	PPNR-NII-2B must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1491	Quality	CPSNP979 <> null	PPNR-NII-3 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1492	Quality	CPSNP980 <> null	PPNR-NII-4 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1493	Quality	CPSNP981 <> null	PPNR-NII-5 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1495	Quality	CPSNP983 <> null	PPNR-NII-6A must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1496	Quality	CPSNP984 <> null	PPNR-NII-6B must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1497	Quality	CPSNP985 <> null	PPNR-NII-6C must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1499	Quality	CPSNP987 <> null	PPNR-NII-7A must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.



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Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Projected	1555	Quality	CPSNQ049 <> null	PPNR-NII-43B must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1556	Quality	CPSNQ051 <> null	PPNR-NII-44A must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1557	Quality	CPSNQ052 <> null	PPNR-NII-44B must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1558	Quality	CPSNQ053 <> null	PPNR-NII-44C must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1559	Quality	CPSNQ054 <> null	PPNR-NII-45 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1560	Quality	CPSNQ055 <> null	PPNR-NII-46 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1561	Quality	CPSNQ056 <> null	PPNR-NII-47 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1584	Quality	If CASNR044 = 'Y' and CPSNQ034/CPSNQ040 > .01, then CPSNQ144 > 0.	If CASNR044 equals Yes and PPNR-NII-36B divided by PPNR-NII-41 is greater than 1%, then PPNR-M-77 must be greater than 0.	FRY14A_2015Q1_Summary_Edits_20150629_V2	CPSNQ034 and CPSNQ144 relate to repos. The Bank's Repos are mostly used for overnight funding and therefore reported with an WAL of 0 months.	
Projected	1585	Quality	If CASNR044 = 'Y' and CPSNQ035/CPSNQ040 > .01, then CPSNQ145 > 0.	If CASNR044 equals Yes and PPNR-NII-36C divided by PPNR-NII-41 is greater than 1%, then PPNR-M-78 must be greater than 0.	FRY14A_2015Q1_Summary_Edits_20150629_V2	CPSNQ035 and CPSNQ145 relate to Other Short Term Borrowings. The Bank's Other Short Term Borrowings are mostly used for overnight funding and therefore reported with an WAL of 0 months.	
Projected	1589	Quality	CPSNQ058 <> null	PPNR-M-1 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1590	Quality	CPSNQ059 <> null	PPNR-M-2 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1591	Quality	CPSNQ060 <> null	PPNR-M-3 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1592	Quality	CPSNQ061 <> null	PPNR-M-4 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1593	Quality	CPSNQ062 <> null	PPNR-M-5 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1594	Quality	CPSNQ063 <> null	PPNR-M-6 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.



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Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Projected	1670	Quality	CPSNQ135 <> null	PPNR-M-68 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1671	Quality	CPSNQ136 <> null	PPNR-M-69 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1672	Quality	CPSNQ137 <> null	PPNR-M-70 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1673	Quality	CPSNQ138 <> null	PPNR-M-71 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1674	Quality	CPSNQ139 <> null	PPNR-M-72 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1675	Quality	CPSNQ140 <> null	PPNR-M-73 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1676	Quality	CPSNQ141 <> null	PPNR-M-74 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1677	Quality	CPSNQ142 <> null	PPNR-M-75 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1678	Quality	CPSNQ143 <> null	PPNR-M-76 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1679	Quality	CPSNQ144 <> null	PPNR-M-77 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1680	Quality	CPSNQ145 <> null	PPNR-M-78 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1681	Quality	CPSNQ146 <> null	PPNR-M-79 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1682	Quality	CPSNQ147 <> null	PPNR-M-80 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Projected	1683	Quality	CPSNQ148 <> null	PPNR-M-81 must not be null.	FRY14A_2015Q1_Summary_Edits_20150629_V2	Edit was triggered on reporting period PQ10+. PQ10+ was a projection period that only applied to the A.2.b—Retail Repurchase sub-schedule. The field noted on this edit was not from the Retail Repurchase sub-schedule.	Amend edit to exclude testing PQ10+.
Vintage	93	Validity	CPSVP100 = CPSVP101 + CPSVP102 + CPSVP103 + CPSVP104	RR-A.1-3 must equal the sum of RR-A.1-4, RR-A.1-5, RR-A.1-6, RR-A.1-7 for each vintage year and total.	FRY14A_2015Q1_Summary_Edits_20150629_V2	There should be an allowance for minor rounding on Repurchase Worksheet.	Rounding noise / See other major themes.
Vintage	95	Validity	CPSVP132 = CPSVP133 + CPSVP134 + CPSVP135 + CPSVP136	RR-C.1-3 must equal the sum of RR-C.1-4, RR-C.1-5, RR-C.1-6, RR-C.1-7 for each vintage year and total.	FRY14A_2015Q1_Summary_Edits_20150629_V2	There should be an allowance for minor rounding on Repurchase Worksheet.	Rounding noise / See other major themes.



Table	Edit Number	Edit Type	Edit Logic	Error Message Display	Source	Justification / Explanation	Recommendations
Vintage	98	Validity	Total CPSVP181 = Total CPSVP182 + Total CPSVP183 + Total CPSVP184 + Total CPSVP185	The summed Total of RR-F.1-3 must equal the summed Total of RR-F.1-4, RR-F.1-5, RR-F.1-6, RR-F.1-7.	FRY14A_2015Q1_Summary_Edits_20150629_V2	There should be an allowance for minor rounding on Repurchase Worksheet.	Rounding noise / See other major themes.
Vintage	129	Intraserries	(CPSVP098)/(CPSVP098-1D_DT) >= 0.95 and (CPSVP098)/(CPSVP098-1D_DT) <= 1.05	RR-A.1-1 should have less than 5% variance from RR-A.1-1 value provided in the most recent prior submission.	FRY14A_2015Q1_Summary_Edits_20150629_V2	On the Repurchase Worksheet, 2015 CCAR included 3 Quarters of actual data for 2014, while 2015 Mid Cycle Submission includes Full Year 2014, and 1 Quarter of 2015.  Retail repurchase original principal balance changes gt 5% from prior filing (CCAR) acceptable as 2014 vintage has one more quarter of data included since prior filing.	Add conditional logic to not run this specific edit rule for vintages not complete or reported in prior filing or remove the 5% threshold and simply confirm that current reporting is same or higher than prior filing
Vintage	130	Intraserries	(CPSVP099)/(CPSVP099-1D_DT) >= 0.95 and (CPSVP099)/(CPSVP099-1D_DT) <= 1.05	RR-A.2-1 should have less than 5% variance from RR-A.2-1 value provided in the most recent prior submission.	FRY14A_2015Q1_Summary_Edits_20150629_V2	On the Repurchase Worksheet, 2015 CCAR included 3 Quarters of actual data for 2014, while 2015 Mid Cycle Submission includes Full Year 2014, and 1 Quarter of 2015.  Retail repurchase original principal balance changes gt 5% from prior filing (CCAR) acceptable as 2014 vintage has one more quarter of data included since prior filing.	Add conditional logic to not run this specific edit rule for vintages not complete or reported in prior filing or remove the 5% threshold and simply confirm that current reporting is same or higher than prior filing
Vintage	131	Intraserries	(CPSVP114)/(CPSVP114-1D_DT) >= 0.95 and (CPSVP114)/(CPSVP114-1D_DT) <= 1.05	RR-B.1-1 should have less than 5% variance from RR-B.1-1 value provided in the most recent prior submission.	FRY14A_2015Q1_Summary_Edits_20150629_V2	On the Repurchase Worksheet, 2015 CCAR included 3 Quarters of actual data for 2014, while 2015 Mid Cycle Submission includes Full Year 2014  Retail repurchase original principal balance changes gt 5% from prior filing (CCAR) acceptable as 2014 vintage has one more quarter of data included since prior filing.	Add conditional logic to not run this specific edit rule for vintages not complete or reported in prior filing or remove the 5% threshold and simply confirm that current reporting is same or higher than prior filing
Vintage	132	Intraserries	(CPSVP115)/(CPSVP115-1D_DT) >= 0.95 and (CPSVP115)/(CPSVP115-1D_DT) <= 1.05	RR-B.2-1 should have less than 5% variance from RR-B.2-1 value provided in the most recent prior submission.	FRY14A_2015Q1_Summary_Edits_20150629_V2	On the Repurchase Worksheet, 2015 CCAR included 3 Quarters of actual data for 2014, while 2015 Mid Cycle Submission includes Full Year 2014  Retail repurchase original principal balance changes gt 5% from prior filing (CCAR) acceptable as 2014 vintage has one more quarter of data included since prior filing.	Add conditional logic to not run this specific edit rule for vintages not complete or reported in prior filing or remove the 5% threshold and simply confirm that current reporting is same or higher than prior filing
Vintage	133	Intraserries	(CPSVP130)/(CPSVP130-1D_DT) >= 0.95 and (CPSVP130)/(CPSVP130-1D_DT) <= 1.05	RR-C.1-1 should have less than 5% variance from RR-C.1-1 value provided in the most recent prior submission.	FRY14A_2015Q1_Summary_Edits_20150629_V2	On the Repurchase Worksheet, 2015 CCAR included 3 Quarters of actual data for 2014, while 2015 Mid Cycle Submission includes Full Year 2014, and 1 Quarter of 2015.  Retail repurchase original principal balance changes gt 5% from prior filing (CCAR) acceptable as 2014 vintage has one more quarter of data included since prior filing.	Add conditional logic to not run this specific edit rule for vintages not complete or reported in prior filing or remove the 5% threshold and simply confirm that current reporting is same or higher than prior filing
Vintage	134	Intraserries	(CPSVP131)/(CPSVP131-1D_DT) >= 0.95 and (CPSVP131)/(CPSVP131-1D_DT) <= 1.05	RR-C.2-1 should have less than 5% variance from RR-C.2-1 value provided in the most recent prior submission.	FRY14A_2015Q1_Summary_Edits_20150629_V2	On the Repurchase Worksheet, 2015 CCAR included 3 Quarters of actual data for 2014, while 2015 Mid Cycle Submission includes Full Year 2014, and 1 Quarter of 2015.  Retail repurchase original principal balance changes gt 5% from prior filing (CCAR) acceptable as 2014 vintage has one more quarter of data included since prior filing.	Add conditional logic to not run this specific edit rule for vintages not complete or reported in prior filing or remove the 5% threshold and simply confirm that current reporting is same or higher than prior filing
Vintage	139	Intraserries	(CPSVP179)/(CPSVP179-1D_DT) >= 0.95 and (CPSVP179)/(CPSVP179-1D_DT) <= 1.05	RR-F.1-1 should have less than 5% variance from RR-F.1-1 value provided in the most recent prior submission.	FRY14A_2015Q1_Summary_Edits_20150629_V2	On the Repurchase Worksheet, 2015 CCAR included 3 Quarters of actual data for 2014, while 2015 Mid Cycle Submission includes Full Year 2014  Retail repurchase original principal balance changes gt 5% from prior filing (CCAR) acceptable as 2014 vintage has one more quarter of data included since prior filing.	Add conditional logic to not run this specific edit rule for vintages not complete or reported in prior filing or remove the 5% threshold and simply confirm that current reporting is same or higher than prior filing
Vintage	140	Intraserries	(CPSVP180)/(CPSVP180-1D_DT) >= 0.95 and (CPSVP180)/(CPSVP180-1D_DT) <= 1.05	RR-F.2-1 should have less than 5% variance from RR-F.2-1 value provided in the most recent prior submission.	FRY14A_2015Q1_Summary_Edits_20150629_V2	On the Repurchase Worksheet, 2015 CCAR included 3 Quarters of actual data for 2014, while 2015 Mid Cycle Submission includes Full Year 2014  Retail repurchase original principal balance changes gt 5% from prior filing (CCAR) acceptable as 2014 vintage has one more quarter of data included since prior filing.	Add conditional logic to not run this specific edit rule for vintages not complete or reported in prior filing or remove the 5% threshold and simply confirm that current reporting is same or higher than prior filing