FR Y-14Q: Retail US HELOC Schedule Instructions

This document provides general guidance and data definitions for the US Home Equity Line of Credit Schedule (HELOC Schedule). This schedule applies to US loans reported on line 1.c.1 of schedule HC-C of the FR-Y9C. For first mortgages and second lien HELOANs, reference the separate instructions and schedules.

For the first reporting period (e.g., September 2011), report monthly portfolio-level data for the US home equity line of credit (HELOC) portfolio by segments from January 2007 to the first reporting period. For subsequent periods, the requirement is to report data for the months within the reporting period. The required segments are presented in Table A below. Reporting BHCs should segment the HELOC portfolio by accounting treatment; product type; original FICO score or equivalent; geography; vintage; original Loan-to-Value (LTV) (or CLTV for second liens); delinquency status; and origination channel. Report only owned loans. Include both held for investment (HFI) and held for sale (HFS) loans. Start each row of data with your BHC name (SAS Variable: BHC_NAME), your RSSD ID number (SAS Variable: RSSD_ID), the reporting month (SAS Variable: REPORTING_MONTH), and Portfolio ID (SAS Variable: PORTFOLIO ID) (use **Heloc** for the Portfolio ID within this schedule).

Table B below lists the summary variables that are to be reported for each portfolio segment. Definitions for each of these variables can be found in Section B, *Summary Variables*, of these instructions. **Provide all dollar unit data in millions of dollars (\$ Millions)**. **Use the SAS variable name and SAS data type provided on the table for the submission.**

The *HELOC Example — Table B* exhibit provides an example of the dataset to be submitted. Columns D to M of this worksheet indicate the specific reported segments while the remaining columns contain the requested summary variables. Rows 3 to 60 are for the following distinct segment: HFI purchased impaired; 1^{st} lien; original FICO score or equivalent <=680; in region #1; originated in 2005 or before; with an original (C)LTV of <=65%; current or 1-59 days past due (DPD); and originated through the retail channel. A new segment starts in row 61. This segment has the same characteristics as the prior segment except that it covers loans originated through the "all other" channel. There are three accounting treatment segments, two product type segments, three original FICO score segments, six geography segments, six vintage segments, four original LTV segments, five delinquency status segments, and two origination channel segments. This results in a maximum size dataset with 25,920 rows of data per reporting month (3 x 2 x 3 x 6 x 6 x 4 x 5 x 2 = 25,920). **Reporting BHCs should submit all data files in SAS format (version 7 or higher) only.** Include in the submission all segments that are not applicable (e.g., there are no loans or accounts in those segments) such that the dataset always has 25,920 rows of data per reporting month. For the summary variables, assign a SAS Missing Value (".") if information is not applicable or not available.

Table C below lists the variables that should be reported for each portfolio segment only for the most recent reporting-month (there is no need to report historical data for these variables). Definitions for each of these variables can be found in Section C, *Snapshot Metrics*, of these instructions. These variables, along with the Table B Summary variables, should be summarized for each portfolio segment and submitted in a separate SAS file. **Use the SAS variable name and SAS data type provided on the table for the submission.** The *HELOC Example – Table B & C* exhibit provides an example of the dataset to be submitted. The maximum size dataset will be 25,920 rows because this should only be reported for the most recent month.

Reporting BHCs should provide a segment ID for each reported segment. This segment ID should be a unique sixteen-digit identifier where each of the pairs of the sixteen digits refers to a specific classification for each of the eight segmentation categories. Refer to Table A below for the attribute codes for the eight segment categories. For example, in the *HELOC Example – Table B* exhibit, the first segment listed has the segment ID 0101010101010101 because each of the attributes for this segment is in the primary position of the attributes list in Table A. Starting with row 61, the second example segment has the segment ID 010101010101010102 because all of the attributes are the same as the prior segment except that origination channel is now "all other", which is listed in the second position of the attributes list in Table A. **Do not drop leading zeros.**

For the requested segment-level summary variables, report unpaid principal balance gross of any partial charge-offs that may have been taken on the loan. For the \$ Gross Contractual Charge-offs, \$ Bankruptcy Charge-offs, \$ Recoveries, and \$ Net Charge-offs report the dollar amount of charge-offs or recoveries for the segment only for the month that they occurred. For the delinquency status segmentation, categorize charge-offs or recoveries by delinquency status at charge-off. A summation of charge-offs or recoveries across the delinquency buckets for a given reporting month should thus result in the total charge-offs or recoveries recorded by the institution in that month. For the \$ Interim Charge-off variable, report cumulative charge-offs through the reporting-month for the loans in the segment.

Table D requests certain aggregate data about loans in the portfolio that should be excluded from the amounts reported in Tables B and C. Definitions for each of these variables can be found in Section D, *Excluded Accounts*, of these instructions. The *Mortgage Data Example – Table D* exhibit provides an example of the dataset to be submitted.

To summarize, the HELOC schedule submission should include three separate SAS files:

- 1. From January 2007 present, the summary variables in Table B should be reported in the segments described in Table A.
- 2. For the most recent reporting month only, the summary variables in Tables B and C should be reported in the segments described in Table A.
- 3. For the most recent reporting month only, the summary variables in Table D should be reported in aggregate. No segmentation is required.

A. Segments

For each of the summary variables and snapshot metrics (to be described in further detail in Section B, Section C, and Section D), information should be reported for the following segments:

- 1. **Accounting Treatment** This refers to accounting treatment of loans reported in this schedule. Reporting BHCs should segment the portfolio into the following three segments:
 - a) HFI Purchased Impaired: held for investment loans accounted for in accordance with ASC subtopic 310-30; loans and debt securities acquired with deteriorated credit quality (formerly

- AICPA statement of position 03-3, accounting for certain loans or debt securities acquired in a transfer).
- b) HFI FVO / HFS: held for investment loans measured at fair value under a fair value option or loans held for sale.
- c) Other: held for investment loans not measured at fair value and not purchased impaired
- Product Type Reporting BHCs should segment the portfolio into product types based on specific features of the loan. If a loan is government insured, do not report any data for that loan on Tables B or C. Instead, include the loan on Table D only. The portfolio should be segmented into two product types:
 - a) HELOC 1st Lien
 - b) HELOC 2nd Lien
- 3. Original FICO score or equivalent Reporting BHCs should segment the portfolio by original FICO score or equivalent. Original FICO score or equivalent should be the score upon which the original underwriting decision was based. If the bank does not have original FICO scores, map the internal score or other bureau score used to the equivalent FICO score. If original FICO score or equivalent is missing or unavailable for a loan, do not report any data for that loan on Tables B or C. Instead, include the loan on Table D only. Segment the portfolio into the following three catagories:
 - a) <=680
 - b) > 680 and <= 720
 - c) >720
- 4. **Geography** Reporting BHCs should report the region in which the property is located. Segment the portfolio into the following six geographical area designations:
 - a) Region 1: Arizona, California and Nevada
 - b) Region 2: Florida
 - c) Region 3: Illinois, Indiana, Michigan, Minnesota, Missouri, Nebraska, Ohio, Wisconsin, North Dakota, South Dakota, Iowa, Kansas
 - d) Region 4: Connecticut, Delaware, Massachusetts, Maryland, Maine, New Hampshire, New Jersey, New York, Rhode Island, Virginia, Vermont and Washington DC
 - e) Region 5: Georgia, Alabama, Kentucky, Louisiana, Mississippi, North Carolina, Pennsylvania, South Carolina, Tennessee, West Virginia and US Territories (Puerto Rico, Guam, etc.)
 - f) Region 6: Colorado, Idaho, Oregon, Washington, Montana, New Mexico, Alaska, Oklahoma, Texas, Arkansas, Utah, Wyoming, and Hawaii
- 5. **Vintage** Vintage refers to the calendar year that the account was originated. There are six possible vintages to report:
 - a) 2005 and Before
 - b) 2006
 - c) 2007
 - d) 2008
 - e) 2009
 - f) 2010 & 2011

- 6. Original LTV (or CLTV for 2nds) The original combined loan-to-value ratio is the original amount of the line, in addition to any senior liens, divided by the property value at the time of origination. If original (C)LTV is missing or unavailable for a loan, do not report any data for that loan on Tables B or C. Instead, include the loan on Table D only. Segment the portfolio as follows:
 - a) <=65
 - b) > 65 and <= 80
 - c) > 80 and <= 90
 - d) > 90
- 7. **Delinquency status** Reporting BHCs should segment the portfolio into the following five delinquency statuses:
 - a) Current & 1-59 DPD: Accounts that are not past due (accruing and non-accruing) or are 1-59 DPD (accruing and non-accruing) as of month-end.
 - b) 60-89 DPD: Accounts that are 60 to 89 days past due (accruing and non-accruing) as of month-end.
 - c) 90-119 DPD: Accounts that are 90 to 119 days past due (accruing and non-accruing) as of month-end.
 - d) 120-179 DPD: Accounts that are 120 to 179 days past due (accruing and non-accruing) as of month-end
 - e) 180+ DPD: Accounts that are 180 or more days past due (accruing and non-accruing) as of month-end.
- 8. **Origination Channel** –Reporting BHCs should segment the portfolio into the following two origination channels:
 - a) Retail
 - b) All Other non-retail origination channels, including wholesale, broker, correspondent, etc.

B. Summary Variables

For each of the segments described above and for each reference month, report information on the following summary variables:

- 1. # Accounts Total number of accounts on the book for the segment as of month-end.
- 2. **\$ Outstandings** Total principal amount outstanding as of the end of the month. This should be reported as unpaid principal balance (UPB) gross of any charge-offs. In other words, the \$ outstanding should not reflect any accounting based write-downs and should only be reduced to zero when the loan has been liquidated either paid in full, charged off, or real estate owned (REO) sold.
- 3. **\$ Commitment** The total dollar amount of HELOC credit lines on the book for the segment as of monthend. The internal automated limit (shadow limit) should be used when there is no contractual limit. For frozen lines, the commitment amount equals the UPB.

- 4. **# New accounts** The total number of new accounts originated (or purchased) in the given month for the segment as of month-end.
- 5. **\$ New accounts** The total dollar amount of new accounts originated (or purchased) in the given month for the segment as of month-end.
- 6. **\$ Commitment increases** The dollar amount commitment (limit) increase on existing HELOC credit lines in the reporting-month.
- 7. **\$ Commitment decreases** The dollar amount decrease on existing HELOC credit lines in the reportingmonth. For frozen lines, the amount of commitment decrease should be the change implied by freezing the line, which ordinarily would be the pre-existing undrawn amount that can no longer be drawn. As the balance pays off and the line remains frozen, the amount of commitment decrease will equal the decrease in UPB.
- 8. **# Sold in month** The total number of accounts for the segment that were sold in the reporting-month. Sales may be to GSEs, to private investors, or in the form of bulk asset sales.
- 9. **\$ Sold in month** The total unpaid principal balance of loans in the segment that were sold in the reporting-month. Sales may be to GSEs, to private investors, or in the form of bulk asset sales.
- 10. \$ Gross contractual charge-offs The total unpaid principal balance for the segment that was contractually charged off during the month. All interim FFIEC write-downs should be included in gross contractual charge-offs in the month that they are taken. Report principal charge-offs only, not interest and fees. For the delinquency status segmentation, categorize charge-offs by delinquency status at charge-off.
- 11. **\$ Bankruptcy charge-offs** The total unpaid principal balance for the segment that was charged off due to bankruptcy as of month-end. Report principal charge-offs only, not interest and fees. For the delinquency status segmentation, categorize charge-offs by delinquency status at charge-off.
- 12. **\$ Recoveries** The total dollar amount of any balance recovery collected during the month from previously charged-off loans for the segment as of month-end. For the delinquency status segmentation, categorize recoveries by delinquency status at charge-off. Recoveries should be reported as a positive value.
- 13. **\$ Net Charge-offs** The total unpaid principal balance for the segment that was charged-off in the reference month, net of any recoveries in the reference month. Report principal charge-offs only, not interest and fees. Generally, \$ net contractual charge-offs should equal [\$ gross contractual charge-offs + \$ bankruptcy charge-offs \$ recoveries].
- 14. Adjustment factor to reconcile \$ gross contractual charge-offs to \$ net charge-offs If it is not the case that \$ net charge-offs equals [\$ gross contractual charge-offs + \$ bankruptcy charge-offs \$ recoveries],

provide the value of \$ net contractual charge-offs minus [\$ gross contractual charge-offs + \$ bankruptcy charge-offs — \$ recoveries] in this variable. As a separate document included in the submission, provide an explanation for such a difference (for example, fraud losses are also included in your BHC's \$ net charge-offs variable). If the adjustment factor variable represents more than one factor leading to the difference, provide a separate breakout of the multiple factors.

- 15. **\$ Foreclosure** The total unpaid principal balance of loans in the foreclosure process. These dollars are pre-REO and should be coded as a foreclosure in the system.
- 16. **\$ New Foreclosure** The total unpaid principal balance of loans that entered the foreclosure process in the reporting month. These dollars are pre-REO and should be coded as a foreclosure in the system.
- 17. **\$ REO** The total unpaid principal balance of mortgages where the bank has obtained the title through foreclosure and the property is on the market and available for sale. Also include instances where the bank has obtained the title but the availability for sale is not known.
- 18. **\$ New REO** The total unpaid principal balance of foreclosed loans where the institution has bought back the property in auction in the reporting month.

C. Snapshot Metrics

For each of the segments described above in Section A and starting only in the most recent reporting month, report information on the following metrics.

- 1. # Accounts that were 60+ DPD in last 12 months The total number of accounts in the reporting segment as of month-end that were 60 or more days past due (DPD) at any given time in the past twelve months ending in the reference month.
- 2. # Accounts ever modified The number of accounts in the segment that have ever been modified.
- 3. \$ Accounts ever modified The total amount of unpaid principal balance in the segment that has ever been modified.
- 4. **# Accounts with utilization rate > 75%** The number of accounts in the segment that have a utilization rate greater than 75%. Calculate utilization rate by dividing a borrower's current outstanding balance by the borrower's current credit limit. For frozen lines, if the UPB exceeds zero, then the utilization is 100%; if the UPB is zero, utilization is undefined.
- 5. **# Accounts with utilization rate <25%** The number of accounts in the segment that have a utilization rate of less than 25%. Calculate utilization rate by dividing a borrower's current outstanding balance by the borrower's current credit limit. Accounts with negative balances should be assigned 0% utilization.
- 6. **# Loans intended for sale** The number of accounts in the segment that are intended for sale rather than to be held for investment. The accounts may be intended for sale to GSEs, to private investors, or as part of a bulk asset sale.

- 7. **\$ Loans intended for sale** The unpaid principal balance associated with accounts in the segment that are intended for sale rather than to be held for investment. The accounts may be intended for sale to GSEs, to private investors, or as part of a bulk asset sale.
- 8. \$ Interim charge-offs The total unpaid principal balance that has been charged-off on loans in the segment through the reporting-month. Interim charge-offs include all cumulative partial charge-offs/write-downs for loan that have not been fully charged-off or otherwise liquidated.

D. <u>Excluded Accounts</u>

Report in Table D all loans excluded from Tables B and C because original FICO Score and/or original LTV cannot be reported. Report loans only for the most recent reporting month and only on an aggregate basis (do not break into multiple segments).

- 1. # Accounts missing LTV only The number of accounts for which original LTV cannot be reported. Exclude loans where original FICO score is also missing.
- 2. \$ Missing LTV only The unpaid principal balance of accounts for which original LTV cannot be reported. Exclude loans where original FICO score is also missing.
- 3. **# Accounts missing FICO score only** The number of accounts for which original FICO score cannot be reported. Exclude loans where original LTV is also missing.
- 4. \$ Missing FICO only The unpaid principal balance of accounts for which original FICO score cannot be reported. Exclude loans where original LTV is also missing.
- 5. **# Accounts missing LTV and FICO score** The number of accounts for which original LTV and original FICO score cannot be reported.
- 6. \$ Missing LTV and FICO score The unpaid principal balance of accounts for which original LTV and original FICO score cannot be reported.

FR Y-14Q: Mortgage Schedule - US Home Equity Line of Credit Schedule

	Table A		Please provide all Dollar Unit data in \$ Millions.														
Definition Reference	Comments	SAS	SAS	SAS	Segment												
Delinition Reference	Segments	Variable Name	Data Type	Format	ID	01	02	03	04	05	06						
						HFI Purchased											
Report Instruction A - 1	Accounting Treatment	ACCOUNTING_TREATMENT	Character	char(35)	1-2	Impaired	HFI FVO / HFS	Other									
Report Instruction A - 2	Product Type	PRODUCT_TYPE	Character	char(35)	3-4	HELOC 1st Lien	HELOC 2nd Lien										
Report Instruction A - 3	Original FICO or Equivalent	ORIG_FICO	Character	char(35)	5-6	<=680	681-720	>720									
Report Instruction A - 4	Geography	GEOGRAPHY	Character	char(35)	7-8	Region 1	Region 2	Region 3	Region 4	Region 5	Region 6						
											2010 &						
Report Instruction A - 5	Vintage	VINTAGE	Character	char(35)	9-10	2005 and Before	2006	2007	2008	2009	2011						
Report Instruction A - 6	Original LTV (or CLTV for 2nds)	ORIG_LTV	Character	char(35)	11-12	<= 65	66 - 80	81 - 90	> 90								
Report Instruction A - 7	Delinquency Status	DLQ_STATUS	Character	char(35)	13-14	Current & 1-59DPD	60-89 DPD	90-119 DPD	120-179 DPD	180+ DPD							
Report Instruction A - 8	Origination Channel	ORIG_CHANNEL	Character	char(35)	15-16	Retail	All Other										

	Та	ble B		
		SAS	SAS	SAS
Definition Reference	Summary Variables	Variable Name	Data Type	Format
Report Instruction B - 1	# Accounts	N_ACCT	Numeric	16.
Report Instruction B - 2	\$ Outstandings	D_OS	Numeric	16.6
Report Instruction B - 3	\$ Commitments	D_COMMITMENTS	Numeric	16.6
Report Instruction B - 4	# New Accounts	N_NEW_ACCOUNTS	Numeric	16.
Report Instruction B - 5	\$ New Accounts	D_NEW_ACCOUNTS	Numeric	16.6
Report Instruction B - 6	\$ Commitment Increases	D_COMMITMENT_INCREASES	Numeric	16.6
Report Instruction B - 7	\$ Commitment Decreases	D_COMMITMENT_DECREASES	Numeric	16.6
Report Instruction B - 8	# Sold in Month	N_SOLD_IN_MONTH	Numeric	16.
Report Instruction B - 9	\$ Sold in Month	D_SOLD_IN_MONTH	Numeric	16.6
Report Instruction B - 10	\$ Gross Contractual Charge-offs	D_GROSS_CONTRACTUAL_CO	Numeric	16.6
Report Instruction B - 11	\$ Bankruptcy Charge-offs	D_BANKRUPTCY_CO	Numeric	16.6
Report Instruction B - 12	\$ Recoveries	D_RECOVERIES	Numeric	16.6
Report Instruction B - 13	\$ Net Charge Offs	D_NET_CO	Numeric	16.6
Report Instruction B - 14	\$ Net Charge Off Reconciliation	D_ADJ_NET_CO	Numeric	16.6
Report Instruction B - 15	\$ Foreclosure	D_FORECLOSURE	Numeric	16.6
Report Instruction B - 16	\$ New Foreclosure	D_NEW_FORECLOSURE	Numeric	16.6
Report Instruction B - 17	\$ REO	D_REO	Numeric	16.6
Report Instruction B - 18	\$ New REO	D_NEW_REO	Numeric	16.6

Report Instruction B - 17	\$ REO	D_REO	Numeric	16.6
Report Instruction B - 18	\$ New REO	D_NEW_REO	Numeric	16.6
	Table	С		
	Snapshot Metrics	SAS	SAS	SAS
Definition Reference	(AS OF MOST CURRENT MONTH)	Variable Name	Data Type	Format
Report Instruction C - 1	# accounts 60+ DPD in Last 12 Months	N_ACCTS_60DPD_LAST12_MONTHS	Numeric	16.
Report Instruction C - 2	# accounts ever modified	N_ACCTS_EVER_MODIFIED	Numeric	16.
Report Instruction C - 3	\$ Accounts Ever modified	D_ACCOUNTS_EVER_MODIFIED	Numeric	16.6
Report Instruction C - 4	# Accounts with utilization rate > 75%	N_ACCTS_UTIL_GT_75	Numeric	16.
Report Instruction C - 5	# Accounts with utilization rate < 25%	N_ACCTS_UTIL_LT_25	Numeric	16.
Report Instruction C - 6	# Loans Intended for Sale	N_LOANS_FOR_SALE	Numeric	16.
Report Instruction C - 7	\$ Loans Intended for Sale	D_LOANS_FOR_SALE	Numeric	16.6
Report Instruction C - 8	\$ Interim Charge-offs	D INTERIM CO	Numeric	16.6

Table D													
Definition Reference	Totals for Excluded Accounts (AS OF MOST CURRENT MONTH)	SAS Variable Name	SAS Data Type	SAS Format									
Report Instruction D - 1	# Accounts Missing LTV only	N_ACCTS_MISSING_LTV_ONLY	Numeric	16.									
Report Instruction D - 2	\$ Missing LTV only	D_MISSING_LTV_ONLY	Numeric	16.6									
Report Instruction D - 3	# Accounts Missing FICO only	N_ACCTS_MISSING_FICO_ONLY	Numeric	16.									
Report Instruction D - 4	\$ Missing FICO only	D_MISSING_FICO_ONLY	Numeric	16.6									
Report Instruction D - 5	# Accounts Missing LTV and FICO	N_ACCTS_MISSING_LTV_AND_FICO	Numeric	16.									
Report Instruction D - 6	\$ Missing LTV and FICO	D MISSING LTV AND FICO	Numeric	16.6									

Regions	US - Geographic Regions
Region 1	AZ, CA, NV
Region 2	FL
Region 3	IL, IN, MI, MN, MO, NE, OH, WI, ND, SD, IA, KS
Region 4	CT, DE, MA, MD, ME, NH, NJ, NY, RI, VA, VT, DC
Region 5	GA, AL, KY, LA, MS, NC, PA, SC, TN, WV, US Territories
Region 6	CO ID OR WA MT NM AK OK TX AR LIT WY HI

В		С	D	E	F	G	Н	ı	1	К	L	М	N	0	P	Q	R	S	Т	U	V	w >	-	Υ	Z	AA	AB	AC	AD	AE AF
io Iden	tifier Dat	a	Segments										Summary	Variables																
						Origination FICO or			Original LTV (or CLTV	Delinquency	Origination			\$	\$	# New	\$ New	\$ New		Commitment	in	\$ Sold \$ Gr in Contra	ctual B		\$	\$ Net	\$ Net Charge-off	\$	\$ New	\$ Nev
	ID# Por 4321 Hel	rtfolio ID		ASC 310-30 Purchased Impaired	Product Type		Geography Region 1	Vintage 2005 and Before	for 2nds)	Status Current + 1-59 DPD	Channel	Month Jan-07	Accounts	Outstandings	Commitment	Origination	Origination	Commitment	Increases	Decreases	Month	Month Charg	-offs Cl	harge-offs	Recoveries	Charge-offs	Reconciliation	Foreclosure	Foreclosure	REO REC
	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Feb-07																		
	4321 Hel			1 Purchased Impaired				2005 and Before		Current + 1-59 DPD		Mar-07																		
	4321 Hel			Purchased Impaired Purchased Impaired				2005 and Before		Current + 1-59 DPD Current + 1-59 DPD		Apr-07 May-07																		
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	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Aug-07																		
	4321 Hel			Purchased Impaired Purchased Impaired				2005 and Before 2005 and Before		Current + 1-59 DPD Current + 1-59 DPD		Sep-07 Oct-07																		
	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Nov-07																		
	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Dec-07																		
	4321 Hel			Purchased Impaired Purchased Impaired				2005 and Before 2005 and Before		Current + 1-59 DPD Current + 1-59 DPD		Jan-08 Feb-08																		
	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Mar-08																		
	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Apr-08																		
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765	4321 Hel	loc	010101010101010101	Purchased Impaired	HELOC 1st Lien	<= 680	Region 1	2005 and Before	<= 65	Current + 1-59 DPD	Retail	Aug-08																		
	4321 Hel			1 Purchased Impaired				2005 and Before		Current + 1-59 DPD		Sep-08																		
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	4321 Hel			Purchased Impaired			.0.	2005 and Before		Current + 1-59 DPD		May-09																		
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	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Jun-10																		
	4321 Hel			Purchased Impaired Purchased Impaired				2005 and Before 2005 and Before		Current + 1-59 DPD		Jul-10 Aug-10																		
	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Sep-10																		
	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Oct-10																		
	4321 Hel			Purchased Impaired Purchased Impaired				2005 and Before 2005 and Before		Current + 1-59 DPD Current + 1-59 DPD		Nov-10 Dec-10																		
	4321 Hel			Purchased Impaired Purchased Impaired				2005 and Before		Current + 1-59 DPD		Jan-11																		
	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Feb-11																		
	4321 Hel			Purchased Impaired			.0.	2005 and Before 2005 and Before		Current + 1-59 DPD Current + 1-59 DPD		Mar-11																		
	4321 Hel 4321 Hel			Purchased Impaired Purchased Impaired				2005 and Before 2005 and Before		Current + 1-59 DPD Current + 1-59 DPD		Apr-11 May-11																		
	4321 Hel			1 Purchased Impaired				2005 and Before		Current + 1-59 DPD		Jun-11																		
	4321 Hel			1 Purchased Impaired				2005 and Before		Current + 1-59 DPD		Jul-11																		
	4321 Hel 4321 Hel			Purchased Impaired Purchased Impaired				2005 and Before 2005 and Before		Current + 1-59 DPD Current + 1-59 DPD		Aug-11 Sep-11																		
765	4321 Hel	oc	010101010101010101	Purchased Impaired	HELOC 1st Lien	<= 680	Region 1	2005 and Before	<= 65	Current + 1-59 DPD	Retail	Oct-11																		
	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Jan-07																		
	4321 Hel 4321 Hel			Purchased Impaired Purchased Impaired				2005 and Before 2005 and Before		Current + 1-59 DPD Current + 1-59 DPD		Feb-07 Mar-07																		
	4321 Hel			2 Purchased Impaired 2 Purchased Impaired				2005 and Before		Current + 1-59 DPD		Apr-07																		
	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		May-07																		
	4321 Hel			Purchased Impaired				2005 and Before 2005 and Before		Current + 1-59 DPD Current + 1-59 DPD		Jun-07																		
	4321 Hel 4321 Hel			2 Purchased Impaired 2 Purchased Impaired			.0.	2005 and Before 2005 and Before		Current + 1-59 DPD Current + 1-59 DPD		Jul-07 Aug-07																		
	4321 Hel			2 Purchased Impaired				2005 and Before		Current + 1-59 DPD		Sep-07																		
	4321 Hel			Purchased Impaired				2005 and Before		Current + 1-59 DPD		Oct-07																		
765	4321 Hel	oc	0101010101010102	Purchased Impaired	HELOC 1st Lien	<= 680	Region 1	2005 and Before	<= 65	Current + 1-59 DPD	All Other	Nov-07																		
765	4321 Hel	loc	0101010101010102	2 Purchased Impaired	HELOC 1st Lien	<= 680	Region 1	2005 and Before	<= 65	Current + 1-59 DPD	All Other	Nov-07																		

																						0	v					M	Ak	NC NC	AD:		Ni.				N	N.			
1 Bus	inecc/Portfolio	Identifier Data	Sep	gments											Summary Variables																										
																									\$ 61911													# Accounts with			
							Origination Fi	CO or			Original LTV (or CLTV for							E New	S New	5 New	Commitme	et \$ Commisme	E # Sold in	\$ Sold in	Contractual	5 Bankruptcy			\$ Net Charge Off					DPD in Last 12	If accounts ever		utilization rate >	utilization rate <	# Loans Intended	\$ Leans Intended	S Interior Charge-
2 89	C Name BHD	RSSO_ID # Por	tfolio ID	Segment ID #	ASC 310-30	Product Typ	e Equivale	at Geography	Vist	age .	2160	DelinquencySta	rus Origination Char	nel Reporting Mont	h # Accounts	\$ Outstanding	s S Commitmen	t Origination	Origination	Commitmen	E Increased	Decreases	Moreh	Month	Charge-offs	Charge-offs 1	Recoveries	S Net Charge Offic	Reconciliation	\$ Foreclosure	\$ New Foreclosur	\$ 860	S New REO	Morehi	modified	Ever modified (#?	j 76%	25%	for Sale	for Sale	offs
k Akc		7654321 Heloc	00	010101000000101	Purchased Impaired	HELDC 1st lies	< 680	Region 1	2005 and Befor	n e	c+ 65	Current = 1-59 D	PD Retail	0.0	11																										
4 ABC		7654321 Heloc	00	01010100000102	Purchased Impaired	HELDC 1st lies	< 680	Region 1	2005 and Befor	n e	c+ 65	Current = 1-59 D	PD All Other	0.0	11																										
6																																									

HELOC Ex - Table D

	Α	В	С	D	Е	F	G	Н	I	J
1	Business/Port	folio Identifier Da	ita		Summary Variables					
2	BHC Name	BHC RSSD_ID #	Portfolio ID	Reporting Month	# non-Gov't Accounts Missing LTV only	\$ non-Gov't Accounts Missing LTV only	# non-Gov't Accounts Missing FICO only	\$ non-Gov't Accounts Missing FICO only	# non-Gov't Accounts Missing LTV and FICO	\$ non-Gov't Accounts Missing LTV and FICO
3	ABC	7654321	Heloc	Oct-11						