



March 27, 2013

Robert deV. Frierson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

RE: Comments to the proposed revisions to the FFIEC 009 and the FFIEC 009a
Federal Register / Vol. 78, No. 19 / Tuesday January 29, 2013
OMB Number 7100-0035

Dear Mr. Frierson,

Ally Financial Inc. ("Ally") appreciates the opportunity to comment on the proposed changes to the FFIEC 009 and FFIEC 009a. While Ally is supportive of the Agencies attempt to refine the data collection process, we do have some concerns over the proposed changes.

Timing of the effective date of the proposed changes

We feel that the proposed effective date of June 30, 2013 is much too aggressive and will not allow us sufficient time to implement the changes, especially in light of the addition of the United States as a reportable country. In addition, the proposed changes will require us to appropriately train and educate overseas personnel who provide much of the data required for the preparation of these reports. As this training cannot begin in earnest until after the rules are finalized, we feel that the proposed effective date of June 30 will not allow us an adequate amount of time to provide appropriate training.

Adding the United States as a reportable country

We do understand the Agency's proposal that adding the United States as a reportable country will allow a reconciliation to the FR Y-9C and provide globally consolidated data. However, we feel that expanding the report to include data applicable to the United States will greatly increase the amount of time required to prepare and analyze the report. The FFIEC 009 is designed to be an aggregation of foreign exposures. Other than allowing a reconciliation to other consolidated reports, we do not see the value of adding the United States as a reportable country. Because of the requirement to report by different sectors, we feel that this will add to the workload of areas that currently provide domestic data to the many other regulatory reports. If the United States remains as a reportable country, we also ask that the Federal Reserve consider providing guidance around reconciling the data to the FR Y-9C.

Thank you for the opportunity to comment on these proposed changes and for your consideration of our comments.

Please contact me should you have any questions regarding our comments.



Sincerely,

A handwritten signature in black ink, appearing to be "Edward Zwicky", with a long horizontal flourish extending to the right.

Edward Zwicky
Ally Financial Inc.

CC: Christopher Weiss