



July 18, 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. 118 / Wednesday, June 19, 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 implementation date of September 30, 2013.

We feel that the proposed effective date of September 30, 2013 is much too aggressive and will not allow us sufficient time to implement the changes and appropriately train and educate data providers, especially in light of the addition of the United States as a reportable country and other substantial changes to the forms. In addition, we still only have draft forms and instructions so the required training and testing cannot begin in earnest until after final rules are provided. We feel that the proposed effective date of September 30, 2013 will not allow us an adequate amount of time to properly prepare for the revised reports. We request that the effective date be delayed until December, 31, 2013.

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 read "Edward Zwicky".

Edward Zwicky  
Ally Financial Inc.  
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CC: David DeBrunner  
*Vice President, Chief Accounting Officer, and Corporate Controller*  
Christopher Weiss  
*Assistant Controller*