

Proposal: FR Y-14A/Q/M - Capital Assessment & Stress Testing (ICP #13-13; pub'd 6/25/13)
Description: Request for comment on a proposal to extend, with revision, the Capital Assessments and Stress Testing (FR Y-14A/Q/M). Published 6/25/13

Comment ID: 111365
From: Robert Sciulli, The PNC Financial Services Group, Inc.
Proposal:
Subject: FR Y-14A/Q/M Capital Assessment & Stress Testing

Comments:

Based on the FR_Y-14Q Corporate Loan requirements, the following is stated:

Fields 49 through 82 (Obligor Financial Data Section), should be reported on all loans as described in Loan Population on the last calendar day of the quarter, excluding loans with:

- (i) An obligor domiciled outside of the US (Field 6),
- (ii) An obligor with a NAICS code beginning with 52 (Finance and Insurance), or 5312 (Real Estate Agents and Brokers);
- (iii) An obligor that is a nonprofit organization or federal, state, or local government or related agencies; and
- (iv) An obligor that is a Natural Person.

(ii) Indicates obligors with a NAICS code beginning with 52 or 5312 are excluded from providing fields 49 through 82. Since the Mortgage REITs are excluded, We believe obligors with a NAICS code beginning with 5311 (Equity REITs) should have the same exclusion. Can this be reviewed for consideration and further clarification?

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