Barkhausen, Henry

From: Barry Henry <Barry.Henry@EverBank.com>

Monday, May 13, 2013 4:58 PM Sent:

To: DFA165i2.reporting

Cc: Newton, Richard W; David Rogers; Marianne Detling

Subject: FW: DFAST Stress Test Template Questions

We also found the following issue with the DFAST template:

In the "Base – Income Statement" tab the formula for line 24 for Net Income appears to have an error. There are two items we noted:

- The formula is not the same for the columns for each period in the worksheet (i.e. the formula for the 9/30 period is different than the other periods).
- The formula does not include the subtraction of Taxes in line 23.

This also appears to be an issue with the other income statement tabs in the template worksheet (adverse, severe). We found these issues when running a test using our 3/31/2013 Call Report data to populate the worksheet and the formula did not properly calculate net income based on the inputs.

Please let me know if you have questions or we can provide assistance.

Barry Henry

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From: Barry Henry

Sent: Friday, May 10, 2013 3:26 PM To: 'DFA165i2.reporting@occ.treas.gov'

Cc: 'Newton, Richard W'

Subject: DFAST Stress Test Template Questions

Below are the two issues we found with the DFAST templates for the 041 Call Report input and our specific questions:

- The balance sheet line 36 for "wholesale funding" adds the field RCONK223 (Schedule RC-E memo line 1.f), however, there is no corresponding subtraction of this amount in line 35 for "retail funding". This results in total liabilities being overstated by the amount in RCONK223. It appears the subtraction of RCONK223 is missing from line 35.
- Balance sheet line item 68 is the template calculation of the "total risk-based capital ratio", which should be the formula of risk-based capital in line 61 divided by risk-weighted assets in line 63. However, the formula in the template divides total capital in line 62 by total risk-weighted assets in line 63. It appears the formula reference to line 62 is an error.

Thanks for your assistance and please call if you have questions.

Barry Henry

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