



FINANCIAL  
SERVICES  
ROUNDTABLE

600 13<sup>th</sup> Street, NW  
SUITE 400  
WASHINGTON, DC 20005  
TEL 202-289-4322  
FAX 202-589-2526

E-Mail:  
[Richard.Foster@FSRoundtable.org](mailto:Richard.Foster@FSRoundtable.org)  
[www.froundtable.org](http://www.froundtable.org)

**RICHARD FOSTER**  
VICE PRESIDENT & SENIOR  
COUNSEL FOR  
LEGAL AND REGULATORY  
AFFAIRS

November 4, 2014

Legislative and Regulatory Activities Division  
Office of the Comptroller of the Currency  
Attention: 1557-NEW  
400 7<sup>th</sup> Street, SW  
Suite 3E-218  
Mail Stop 9W-11  
Washington, DC 20219

Re: Domestic Credit Card Data; Domestic Residential Home Equity Lending Data; and  
Domestic First Lien Residential Mortgage Data

Dear Sir or Madam:

The Office of the Comptroller of the Currency (OCC) has published three separate notices that request comment on the proposed collection of data related to domestic credit card receivables, home equity lines of credit, and residential mortgage loan origination and servicing (the Notices).<sup>1</sup> The Financial Services Roundtable (FSR) appreciates the opportunity to comment on the Notices.<sup>2</sup> This letter is our response to all of the data collection proposals covered by the Notices.

The Notices seek comment on the utility and burden of the proposed data collection. It is difficult, however, for FSR members to evaluate the utility and burden of the proposals based upon the information provided in the Notices. While the Notices provide a general description of the data requested, they are not accompanied by templates, which indicate the specific data to be collected. Moreover, it is not clear which national banks will be subject to these data collection requirements. The Notices contain estimates of the number of national banks subject to the data

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<sup>1</sup> 79 Fed. Reg. 53101-53104 (Sept. 5, 2014).

<sup>2</sup> As *advocates for a strong financial future*<sup>TM</sup>, FSR represents 100 integrated financial services companies providing banking, insurance, and investment products and services to the American consumer. Member companies participate through the Chief Executive Officer and other senior executives nominated by the CEO. FSR member companies provide fuel for America's economic engine, accounting directly for \$98.4 trillion in managed assets, \$1.1 trillion in revenue, and 2.4 million jobs.

collection, but fail to more fully identify those banks.<sup>3</sup> Furthermore, while the Notices propose a general timeframe for the submission of the data (e.g., monthly or quarterly), they do not propose an effective date for this data collection. In sum, without additional detail regarding the data collection proposed in the Notices, FSR members are unable to provide input on the utility and burden of the proposals.

Additionally, we are concerned that the data to be collected may duplicate data that banking organizations already are providing to the Federal Reserve Board in connection with that agency's FRY-14 reporting requirements, or may be based upon different data elements and different definitions. The potential for duplication is particularly relevant to national banks that are the dominant subsidiary in a holding company structure. Therefore, before the OCC proceeds with the data collection proposed in the Notices, we recommend strongly that the OCC first coordinate this data collection with the Federal Reserve Board's data collection to minimize duplicative or divergent reporting requirements.

Reducing data overlap or conflict could be accomplished in various ways. The OCC could accept, to the maximum extent possible, the data that is currently submitted to the Federal Reserve Board in connection with the FRY-14 filings in satisfaction of the data required by the Notices. Alternatively, the OCC and the Federal Reserve Board could agree upon a single set of data with identical file layouts and definitions. Yet another option would be for the Federal Reserve Board to add data elements that designate whether a loan is part of the bank or a non-bank affiliate.

Thank you for considering the concerns raised in this letter. We appreciate the opportunity to share our views. If you have any questions, please contact Rich Foster of FSR at (202) 589-2424.

Sincerely,

A handwritten signature in black ink that reads "Rich Foster". The signature is written in a cursive, slightly stylized font.

Vice President & Senior Counsel for  
Regulatory and Legal Affairs

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<sup>3</sup> The proposed credit card data collection is estimated to apply to 17 national banks; the proposed home equity lines of credit data collection is estimated to apply to 64 national banks; and the proposed residential mortgage data collection is estimated to apply to 61 national banks.