



November 15, 2007

Communications Division
Public Information Room
Office of the Comptroller
of the Currency
250 E Street, S.W.
Mailstop 1-5
Washington, D.C. 20219
Attention: No. 1557-0081
regs.comments@occ.treas.gov

Steven F. Hanft
Clearance Officer
Room MB-2088
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429
Attention: No. 3064-0052
comments@FDIC.gov

Jennifer J. Johnson
Secretary
Board of Governors of the
Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551
Attention: No. 7100-0036
regs.comments@federalreserve.gov

Information Collection Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, N.W.
Washington, D.C. 20552
Attention: 1550-0023
infocollection.comments@ots.treas.gov

Re: FFIEC Call Report Revisions Notice and Request for Comment

Ladies and Gentlemen:

Citigroup appreciates the opportunity to comment on the proposed revisions to the Consolidated Reports of Condition and Income (Call Report) set forth in the joint notice and request for comment by the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System and the Federal Deposit Insurance Corporation (collectively "the Agencies").

Citigroup supports the Agencies proposed clarification to the Call Report Instructions in which the definition of Trading Account assets is expanded to include loans that are measured at fair value in accordance with SFAS No. 159, "The Fair Value Option for Financial Assets and Financial Liabilities," *and* are managed as a trading position. This change permits these loans to be risk-weighted in accordance with the market risk-based capital guidelines when calculating the risk-weighted assets. This is appropriate considering all related hedging positions would be risk-weighted likewise under these guidelines.

However, Citigroup requests that the Agencies reconsider the proposed expanded disclosure requirements on Schedule RC-D, "Trading Assets and Liabilities." Collection of the data for this disclosure is performed manually and any expansion of its

requirements increase the burden exponentially as data must be retrieved, consolidated, reconciled for completeness, and reviewed for proper classification before reporting to our regulators.

Additionally, Citigroup supports the comments presented in The Clearing House letter dated November 13, 2007.

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Citigroup appreciates the opportunity to comment on the issues contained in the Agencies' proposal. If you have any questions, please contact me at (212) 559-4883 or Peter Bieszard at (212) 559-4118.

Sincerely,



William J. Gonska
Deputy Controller

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