



Trepp, LLC

477 Madison Avenue · New York, NY 10022

212-754-1010 · www.trepp.com

December 21, 2015

Via E-Mail: regs.comments@occ.treas.gov

Legislative and Regulatory Activities Division

Office of the Comptroller of the Currency

Attention: 1557–0311

400 7th Street SW., Suite 3E–218

Mail Stop 9W–11

Washington, DC 20219

RE: *Reporting Form: OCC DFAST 10-50 Results Template*
Title: Annual Company-Run Stress Test Reporting Template and Documentation for Covered Institutions with Total Consolidated Assets of \$10 Billion to \$50 Billion under the Dodd-Frank Wall Street Reform and Consumer Protection Act.
OMB Control No.: 1557–0311

To Whom It May Concern:

Trepp welcomes the opportunity to comment on the proposed information collection. Trepp is a data and analytics provider, serving the banking, CMBS and commercial real estate markets. Our Trepp Capital Adequacy Stress Test (T-CAST) module enables banks to forecast their income statements, balance sheet and capital under multiple scenarios, including Severely Adverse, Adverse and Baseline, as well as custom-defined scenarios.

We believe that stress testing is a valuable tool for modeling capital adequacy and ensuring the health of both individual institutions and the banking system overall. We are pleased to see that the proposed changes to the DFAST Reporting Forms include clarifications of the instructions and re-alignment of the reported items with corresponding elements of the call reports.

We have found a few areas that we believe need some additional clarification.

We respectfully submit the following comments.

- 1) Balance Sheet Statement, lines 50, 51 and 53 – regulatory capital ratios.

The template lists both RCFA/RCFW and RCOA/RCOW items but the instructions do not specify a preference for either the RCFA/RCOA or the RCFW/RCOW items. It is likely that there would be a preference for RCFA/RCOA, given that the RCFW/RCOW items are for advanced approaches institutions. Still it would be desirable to clarify which capital ratio should be selected in cases where there might be ambiguity.

We would recommend either removing the RCFW/RCOW labels from the reporting template, or including a preference for either RCFA/RCOA or RCFW/RCOW in the instructions.

2) Balance Sheet Statement, line 48 – risk weighted assets

Similar to our comment #1 above, both the RCFA/RCFW and RCOA/RCOW MDRMs from the call report are referenced, but the instructions do not specify a preference, in cases where both might be present.

Also, there appears to be an error in the 041 call report item list. We believe the second item listed should be “RCOWA223” rather than “RCOW223”.

3) Income Statement, memorandum item - Total other-than-temporary impairment (OTTI) losses.

Line 25 of the Income Statement is labeled “Total other-than-temporary impairment (OTTI) losses” and identified with the call report MDRM RIADJ321. However, in the call report, RIADJ321 refers to Net OTTI, rather than Total OTTI. Total OTTI in the call report is item RIADJ319. We think either the MDRM or the label for line 25 of the Income Statement needs to be changed.

Thank you for the opportunity to comment on the Stress Test Reporting Template. Should there be any questions concerning the comments above, please contact Matthew Anderson, Managing Director at +1 212 329 6188 or via email at matthew_anderson@trepp.com.

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