

From: [Gottlieb, Mary](#)
To: [Merritt, Shaquita](#)
Subject: FW: FFIEC 031 and FFIEC 041
Date: Wednesday, November 18, 2015 11:14:37 AM
Attachments: [image002.png](#)
[FFIEC031_FFIEC041_20150922_Comment02.pdf](#)

Mark called. The text of the comment letter that goes with the marked up form is below.

From: Mark Tokarski [mailto:mark.e.tokarski@frb.gov]
Sent: Wednesday, November 18, 2015 11:13 AM
To: Gottlieb, Mary
Subject: FFIEC 031 and FFIEC 041

From: Mark Tokarski
Sent: Tuesday, September 22, 2015 8:09 PM
To: rstorch@fdic.gov (External) <rstorch@fdic.gov>; 'Marroquin, Juan J' (<Juan.Marroquin@occ.treas.gov> <Juan.Marroquin@occ.treas.gov>; Douglas Carpenter <douglas.w.carpenter@frb.gov>
Cc: Kuiper, Gary (<GKuiper@FDIC.gov> <GKuiper@FDIC.gov>; Gottlieb, Mary (<Mary.Gottlieb@occ.treas.gov> <Mary.Gottlieb@occ.treas.gov>; Merritt, Shaquita (<Shaquita.Merritt@occ.treas.gov> <Shaquita.Merritt@occ.treas.gov>; Daniel Newman <daniel.b.newman@frb.gov>
Subject: FFIEC 031 and FFIEC 041

The Board received the following text and attached public comment letter for the Call Report:

Please refer to the attached file.

Public Comments on Agency Information Collection Activities; Proposals, Submissions, and Approvals:

Title: Agency Information Collection Activities; Proposals, Submissions, and Approvals

FR Document Number: 2015-23402

RIN:

Publish Date: 9/18/2015 12:00:00 AM

Submitter Info:

First Name: James

Last Name: Oranga

Mailing Address: 9700 West Higgins Road

City: Rosemont

Country: United States

State or Province: IL

ZIP/Postal Code: 60018

Email Address: [a href="mailto:joranga@wintrust.com"]joranga@wintrust.com[/a]

Organization Name: Wintrust Financial Corporation

Comment: In keeping with the intent for burden-reducing revisions to the Call Report, it would be ideal if RC-E line items M.2.b. and M.2.c can be combined into one single line

item. This combined line item will be consistent with the proposed new calculations needed for RC-E.M.3. See attached file(s)

Thanks,

Mark Tokarski

Sr. Regulatory Analyst | Information Collection Coordination (ICC)



Federal Reserve Board of Governors

Office: 202-452-5241

[Learn More About OCDO](#)

Schedule RC-E—Continued

Memoranda—Continued

Dollar Amounts in Thousands

	RCON	Bil	Mil	Thou	
2. Components of total nontransaction accounts (sum of Memorandum items 2.a through 2.d must equal item 7, column C above):					
a. Savings deposits:					
(1) Money market deposit accounts (MMDAs)	6810				M.2.a.(1)
(2) Other savings deposits (excludes MMDAs)	0352				M.2.a.(2)
b. Total time deposits of less than \$100,000	6648				M.2.b.
c. Total time deposits of \$100,000 through \$250,000	J473				M.2.c.
d. Total time deposits of more than \$250,000	J474				M.2.d.
e. Individual Retirement Accounts (IRAs) and Keogh Plan accounts of \$100,000 or more included in Memorandum items 2.c and 2.d above	F233				M.2.e.
3. Maturity and repricing data for time deposits of less than \$100,000: \$250,000 or less					
a. Time deposits of less than \$100,000 with a remaining maturity or next repricing date of: ^{1,2}					
(1) Three months or less	A579				M.3.a.(1)
(2) Over three months through 12 months	A580				M.3.a.(2)
(3) Over one year through three years	A581				M.3.a.(3)
(4) Over three years	A582				M.3.a.(4)
b. Time deposits of less than \$100,000 with a REMAINING MATURITY of one year or less (included in Memorandum items 3.a.(1) and 3.a.(2) above) ³	A241				M.3.b.
4. Maturity and repricing data for time deposits of more than \$250,000					
a. Time deposits of more than \$250,000 with a remaining maturity or next repricing date of: ^{1,4}					
(1) Three months or less	A584				M.4.a.(1)
(2) Over three months through 12 months	A585				M.4.a.(2)
(3) Over one year through three years	A586				M.4.a.(3)
(4) Over three years	A587				M.4.a.(4)
b. Time deposits of \$100,000 through \$250,000 with a REMAINING MATURITY of one year or less (included in Memorandum items 4.a.(1) and 4.a.(2) above) ³	K221				M.4.b.
c. Time deposits of more than \$250,000 with a REMAINING MATURITY of one year or less (included in Memorandum items 4.a.(1) and 4.a.(2) above) ³	K222				M.4.c.
5. Does your institution offer one or more consumer deposit account products, i.e., transaction account or nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use?					
	RCON	Yes		No	
	P752				M.5.

Memorandum items 6 and 7 are to be completed by institutions with \$1 billion or more in total assets⁵ that answered "Yes" to Memorandum item 5 above.

Dollar Amounts in Thousands

	RCON	Bil	Mil	Thou	
6. Components of total transaction account deposits of individuals, partnerships, and corporations (sum of Memorandum items 6.a, 6.b, and 6.c must equal item 1, column A above):					
a. Total deposits in those noninterest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use	P753				M.6.a.
b. Total deposits in those interest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use	P754				M.6.b.
c. Total deposits in all other transaction accounts of individuals, partnerships, and corporations	P755				M.6.c.

1. Report fixed-rate time deposits by remaining maturity and floating rate time deposits by next repricing date.

2. Sum of Memorandum items 3.a.(1) through 3.a.(4) must equal Schedule RC-E, Memorandum item 2.b. **sum of Memorandum items 2.b and 2.c.**

3. Report both fixed-and floating-rate time deposits by remaining maturity. Exclude floating-rate time deposits with a next repricing date of one year or less that have a remaining maturity of over one year.

4. Sum of Memorandum items 4.a.(1) through 4.a.(4) must equal Schedule RC-E, **sum of Memorandum items 2.c and 2.d.**

5. The \$1 billion asset size test is generally based on the total assets reported on the June 30, 2014, Report of Condition.