DEPARTMENT OF THE TREASURY
Office of the Comptroller of the Currency

FEDERAL RESERVE SYSTEM

FEDERAL DEPOSIT INSURANCE CORPORATION

DEPARTMENT OF THE TREASURY
Office of Thrift Supervision

Proposed Agency Information Collection Activities; Comment Request

AGENCIES: Office of the Comptroller of the Currency (OCC), Treasury; Board of Governors of the Federal Reserve System (Board); Federal Deposit Insurance Corporation (FDIC); and Office of Thrift Supervision (OTS), Treasury.

ACTION: Joint notice and request for comment.

SUMMARY: In accordance with the requirements of the Paperwork Reduction Act of 1995 (44 U.S.C. chapter 35), the OCC, the Board, the FDIC, and the OTS (collectively, the agencies) may not conduct or sponsor, and the respondent is not required to respond to, an information collection unless it displays a currently valid Office of Management and Budget (OMB) control number. The Federal Financial Institutions Examination Council (FFIEC), of which the agencies are members, has approved the agencies' publication for public comment of proposed new regulatory reporting requirements for banks[1] that qualify for and adopt the Advanced Capital Adequacy Framework to calculate their risk-based capital requirement or are in the parallel run stage of qualifying to adopt this framework. The proposal describes the scope of reporting and the proposed reporting requirements. At the end of the comment period, the comments and

[1] For simplicity, and unless otherwise indicated, this notice uses the term "bank" to include banks, savings associations, and bank holding companies (BHCs). The terms "bank holding company" and "BHC" refer only to bank holding companies regulated by the Board and do not include savings and loan holding companies regulated by the OTS. For a detailed description of the institutions covered by this notice, refer to Part I, Section 1, of the proposed regulatory text in the notice of proposed rulemaking entitled Risk-Based Capital Standards: Advanced Capital Adequacy Framework.

recommendations received will be analyzed to determine the extent to which the FFIEC should modify the proposed reporting requirements prior to giving its final approval. The agencies will then submit the proposed reporting requirements to OMB for review and approval and, upon approval, OMB will assign control numbers.

DATES: Comments must be received on or before [INSERT DATE 120 DAYS FROM DATE OF PUBLICATION IN THE FEDERAL REGISTER].

ADDRESSES: Interested parties are invited to submit written comments to any or all of the agencies. All comments will be shared among the agencies.

OCC: You may submit comments, identified by "OMB Control No. 1557-NEW," by any of the following methods:

- E-mail: regs.comments@occ.treas.gov. Include "OMB Control No. 1557-NEW" in the subject line of the message.
- Fax: (202) 874-4448.
- Mail: Public Information Room, Office of the Comptroller of the Currency, 250 E Street, SW., Mailstop 1-5, Washington, DC 20219; Attention: OMB Control No. 1557-NEW.

Public Inspection: You may inspect and photocopy comments at the Public Information Room. You can make an appointment to inspect the comments by calling (202) 874-5043.

Board: You may submit comments, which should refer to "Advanced Capital Adequacy Framework Regulatory Reporting Requirements," by any of the following methods:

- Agency Web Site: http://www.federalreserve.gov. Follow the instructions for submitting comments on the http://www.federalreserve.gov/generalinfo/foia/ProposedRegs.cfm.
- Federal eRulemaking Portal: http://www.regulations.gov. Follow the instructions for submitting comments.

- E-mail: regs.comments@federalreserve.gov. Include "Advanced Capital Adequacy Framework Regulatory Reporting Requirements" in the subject line of the message.
- FAX: 202-452-3819 or 202-452-3102.
- Mail: Jennifer J. Johnson, Secretary, Board of Governors of the Federal Reserve System, 20th Street and Constitution Avenue, NW., Washington, DC 20551.

All public comments are available from the Board's web site at www.federalreserve.gov/generalinfo/foia/ProposedRegs.cfm as submitted, unless modified for technical reasons. Accordingly, your comments will not be edited to remove any identifying or contact information. Public comments may also be viewed electronically or in paper in Room MP-500 of the Board's Martin Building (20th and C Streets, NW.) between 9:00 a.m. and 5:00 p.m. on weekdays.

FDIC: You may submit comments, which should refer to "Advanced Capital Adequacy Framework Regulatory Reporting Requirements," by any of the following methods:

- http://www.FDIC.gov/regulations/laws/federal/notices.html.
- E-mail: comments@FDIC.gov. Include "Advanced Capital Adequacy Framework Regulatory Reporting Requirements" in the subject line of the message.
- Mail: Steven F. Hanft, Clearance Officer (202-898-3907), Legal Division, Federal Deposit Insurance Corporation, 550 17th Street, NW., Washington, DC 20429.
- Hand Delivery: Comments may be hand delivered to the guard station at the rear of the 550 17th Street Building (located on F Street) on business days between 7 a.m. and 5 p.m.

Public Inspection: All comments received will be posted without change to http://www.fdic.gov/regulations/laws/federal/propose.html including any personal information provided. Comments may be inspected at the FDIC Public Information Center, Room E-1002, 3502 North Fairfax Drive, Arlington, VA 22226, between 9 a.m. and 5 p.m. on business days.

OTS: You may submit comments, identified by "Advanced Capital Adequacy Framework Regulatory Reporting Requirements (1550-NEW)," by any of the following methods:

- Federal eRulemaking Portal: http://www.regulations.gov. Follow the instructions for submitting comments.
- E-mail address: infocollection.comments@ots.treas.gov. Please include "Advanced Capital Adequacy Framework Regulatory Reporting Requirements (1550-NEW)" in the subject line of the message and include your name and telephone number in the message.
- Fax: (202) 906-6518.
- Mail: Information Collection Comments, Chief Counsel's Office, Office of Thrift Supervision, 1700 G Street, NW., Washington, DC 20552, Attention: "Advanced Capital Adequacy Framework Regulatory Reporting Requirements (1550-NEW)."
- Hand Delivery/Courier: Guard's Desk, East Lobby Entrance, 1700 G Street, NW., from 9:00 a.m. to 4:00 p.m. on business days, Attention: Information Collection Comments, Chief Counsel's Office, Attention: "Advanced Capital Adequacy Framework Regulatory Reporting Requirements (1550-NEW)."

Instructions: All submissions received must include the agency name and "Advanced Capital Adequacy Framework Regulatory Reporting Requirements (1550-NEW)." All comments received will be posted without change to the OTS Internet Site at http://www.ots.treas.gov/pagehtml.cfm?catNumber=67&an=1, including any personal information provided.

Docket: For access to the docket to read background documents or comments received, go to http://www.ots.treas.gov/pagehtml.cfm?catNumber=67&an=1.

In addition, you may inspect comments at the Public Reading Room, 1700 G Street, NW., by appointment. To make an appointment for access, call (202) 906-5922, send an e-mail to public.info@ots.treas.gov, or send a facsimile transmission to (202) 906-7755. (Prior notice identifying the materials you will be requesting will assist us in serving you.) We schedule appointments on business days between 10:00 a.m. and 4:00 p.m. In most cases, appointments will be available the next business day following the date we receive a request.

A copy of the comments may also be submitted to the OMB desk officer for the agencies by mail to the Office of Information and Regulatory Affairs, U.S. Office of Management and Budget, New Executive Office Building, Room 10235, 725 17th Street, NW., Washington, DC 20503, or by fax to (202) 395-6974.

FOR FURTHER INFORMATION CONTACT:

For further information about the proposed regulatory reporting requirements discussed in this notice, please contact any of the agency clearance officers whose names appear below. In addition, copies of reporting schedules and instructions can be obtained at each agency's web site as well as the FFIEC's web site.[2]

OCC: Please direct substantive questions to Lorey Hoffman, Large Bank Director, Large Bank Supervision, (202) 874-4595, and requests for copies of the collection to Mary Gottlieb, OCC Clearance Officer, or Camille Dickerson, (202-874-5090), Legislative and

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[2] For the OCC: http://www.occ.treas.gov; for the FDIC: http://www.fdic.gov; for the OTS: http://www.ots.treas.gov; for the Board: http://www.federalreserve.gov/boarddocs/reportforms/review.cfm; and for the FFIEC: http://www.ffiec.gov/ffiec_report_forms.htm.

Regulatory Activities Division, Office of the Comptroller of the Currency, 250 E Street, SW., Washington, DC 20219.

Board: Michelle Long, Federal Reserve Board Clearance Officer, Division of Research and Statistics, Board of Governors of the Federal Reserve System, Washington, DC 20551 (202-452-3829).

FDIC: Steven F. Hanft, Clearance Officer, at shanft@fdic.gov, (202-898-3907), Legal Division, Federal Deposit Insurance Corporation, 550 17th Street, NW., Washington, DC 20429.

OTS: Marilyn K. Burton, OTS Clearance Officer, at marilyn.burton@ots.treas.gov, (202) 906-6467, or facsimile number (202) 906-6518, Litigation Division, Chief Counsel's Office, Office of Thrift Supervision, 1700 G Street, NW., Washington, DC 20552.

SUPPLEMENTARY INFORMATION: The agencies are proposing to implement the following new information collections.

Report Title: Advanced Capital Adequacy Framework Regulatory Reporting Requirements.

Form Numbers: FFIEC 101.

Frequency of Response: Quarterly.

Affected Public: Business or other for-profit.

OCC:

OMB Number: 1557-NEW.

Estimated Number of Respondents: 52 national banks.

Estimated Time per Response: 280 hours.

Estimated Total Annual Burden: 58,240 hours.

Board:

OMB Number: 7100-NEW.

Estimated Number of Respondents: 6 state member banks.

Estimated Time per Response: 280 hours.

Estimated Total Annual Burden: 6,720 hours.

OMB Number: 7100-NEW.

Estimated Number of Respondents: 15 BHCs.

Estimated Time per Response: 280 hours.

Estimated Total Annual Burden: 16,800 hours.

FDIC:

OMB Number: 3064-NEW.

Estimated Number of Respondents: 19 state nonmember banks.

Estimated Time per Response: 280 hours.

Estimated Total Annual Burden: 21,280 hours.

OTS:

OMB Number: 1550-NEW.

Estimated Number of Respondents: 5 savings associations.

Estimated Time per Response: 280 hours.

Estimated Total Annual Burden: 5,600 hours.

General Description of Reports

These information collections would be mandatory for banks using the Advanced Capital Adequacy Framework: 12 U.S.C. 161 (for national banks), 12 U.S.C. 324 and 12 U.S.C. 1844(c) (for state member banks and BHCs, respectively), 12 U.S.C. 1817 (for insured state nonmember commercial and savings banks), and 12 U.S.C. 1464 (for savings associations). These information collections would be given confidential treatment (5 U.S.C. 552(b)(4)) except for selected data items to be released for data collected from a reporting entity during periods subsequent to its parallel run period (Schedules A and B, and data items 1-7 of Schedule V).

Abstract

Each bank that qualifies for and applies the advanced internal ratings-based approach for credit risk and the advanced measurement approach for operational risk would file quarterly regulatory data for the agencies' use in assessing and monitoring the levels and components of each reporting entity's risk-based capital requirements and the adequacy of the entity's capital under the Advanced Capital Adequacy Framework. These data also would support the agencies' efforts to evaluate the quantitative impact and competitive implications of the advanced capital adequacy framework on individual reporting entities and on an industry-wide basis. The reporting schedules would also assist banks in understanding expectations surrounding the system development necessary for implementation and validation of the Advanced Capital Adequacy Framework. The submitted data that is released publicly would also provide other interested parties with information about banks' risk-based capital. In addition, the submitted data would supplement on-site examination processes.

Current Actions

Risk-Based Capital Standards: Advanced Capital Adequacy Framework: Regulatory Reporting Requirements

I. Background

The agencies have today published a joint notice of proposed rulemaking entitled Risk-Based Capital Standards: Advanced Capital Adequacy Framework (the NPR).[3] The NPR describes a new regulatory capital framework for U.S. banks that qualify for and adopt the advanced internal ratings-based (AIRB) approach for credit risk and the advanced measurement approach (AMA) for operational risk (together, the advanced approaches). Included within the NPR are requirements for public disclosure of certain information at the consolidated banking organization level as well as a reference to certain additional regulatory reporting requirements for depository institutions (DIs) and BHCs. The additional regulatory reporting requirements referenced within the NPR, and described more fully herein, comprise the agencies' proposed regulatory reporting requirements.

The agencies, all of which would have access to both the public and confidential data submitted in these schedules by each bank, would use the data collected through this proposal to:

- Assess the components of each bank's risk-based capital requirements;
- Assess each bank's capital relative to inherent risks and the agencies' minimum capital requirements;
- Monitor the levels and components of the risk-based capital requirements for banks through peer, outlier, and risk trend analyses;

[3] Terms used in this text and in the proposed regulatory reporting schedules and instructions are used as defined in the NPR.

- Evaluate the quantitative impact and competitive implications of the implementation of the Advanced Capital Adequacy Framework on risk-based capital levels within reporting banks and on an overall industry basis;
- Provide market participants, depositors, the public, supervisors, and other interested parties with information about banks' risk-based capital; and
- Supplement on-site examination processes and decisions pertaining to the allocation of supervisory resources.

In addition, this proposal would assist supervised institutions in understanding expectations surrounding the system development necessary for implementation and validation of the Advanced Capital Adequacy Framework.

The agencies require the ability to monitor and assess individual banks' conformance with capital adequacy standards and understand the capital resulting from the implementation of the Advanced Capital Adequacy Framework. The current regulatory capital data submitted by banks would not provide relevant information regarding risk-based capital under the Advanced Capital Adequacy Framework. As a result, the agencies outline in this notice their proposed changes in regulatory capital reporting for banks using the Advanced Capital Adequacy Framework within the United States. Because the NPR includes transitional arrangements that involve capital floors linked to the general risk-based capital rules (as defined in the NPR), the agencies believe it is necessary to require data submissions under both the general risk-based capital rules and advanced risk-based capital frameworks for as long as a bank is subject to risk-based capital floors.

As noted in the NPR, the agencies intend to conduct analyses to gauge the impact of the Advanced Capital Adequacy Framework, and the preparedness of banks to compute risk-based capital consistent with those requirements, during the parallel run and transitional floor periods. Data submitted through this proposal, combined with dual reporting requirements for the general risk-based capital data,[4] would provide quantitative support for these impact analyses. Such analyses would also help the agencies evaluate the competitive and cyclical implications of the Advanced Capital Adequacy Framework relative to capital requirements for banks subject to the general risk-based capital rules and the adequacy of capital generated under the Advanced Capital Adequacy Framework.

A bank that applies the proposed advanced approaches would generally use its internal risk measurement systems to estimate risk parameters for credit risk exposures and to estimate operational risk exposure. The bank would use specific risk-based capital formulas to transform the risk parameters into risk-weighted asset amounts for each wholesale credit exposure and segment of retail credit exposures. For each wholesale credit exposure and segment of retail credit exposures, a bank would assign three quantitative risk parameter estimates: probability of default (PD), which measures the likelihood that an obligor will default over a one-year horizon; loss given default (LGD), which is an estimate of the economic loss if a default occurs during downturn economic conditions; and exposure at default (EAD), which is measured in dollars and is an estimate of the amount that would be owed to the bank at the time of default. For each wholesale credit exposure, the bank would also determine effective maturity (M), which is measured in years and reflects the effective remaining maturity of the exposure. These risk parameters are the drivers of the bank's regulatory capital requirement for wholesale and retail credit exposures and the focus of much of the proposed regulatory reporting.

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[4] General risk-based capital data under the existing risk-based capital standards are currently captured in the Consolidated Reports of Condition and Income (Call Report) for banks (Form FFIEC 031 or FFIEC 041; OMB No. 1557-0081 for the OCC, 7100-0036 for the Board, and 3064-0052 for the FDIC), the Thrift Financial Report (TFR) for savings associations (OTS Form 1313; OMB No. 1550-0023), and the Consolidated Financial Statements for Bank Holding Companies (Board Form FR Y-9C; OMB No. 7100-0128).

Under the advanced approaches, a bank would employ simple risk weights to determine regulatory capital requirements for certain equity and securitization exposures, and may use internal models to determine regulatory capital requirements for other equity and securitization exposures, as well as for operational risk. The associated proposed regulatory reporting schedules primarily relate to data on inputs to and outputs from these internal models and risk-weight functions.

Under the advanced approaches, a bank would use its internal systems and processes to assess its exposure to operational risk. The proposed operational risk reporting schedule would capture some of the critical inputs used by the bank to estimate its operational risk exposure.

The agencies believe it is necessary to develop surveillance tools to assist in monitoring banks' risk-based capital measures. Such surveillance tools include the ability to perform bank-to-bank comparisons of the risk-based capital drivers underlying banks' capital measures, the ability to identify potential outliers through bank-to-peer comparisons, and the ability to monitor banks' capital measures over time relative to trends in other risk indicators.

The agencies believe that certain information about banks' risk-based capital calculations that would be submitted under this proposal should be publicly available to market participants and that such disclosures at the bank level are consistent with the agencies' objectives of promoting market discipline as described in part VII of the preamble of the NPR. The agencies intend that the public data items contained within this proposal would provide market participants with basic, summary-level standardized information about the main components of banks' risk-based capital requirements. The standardized regulatory reporting information that would be available to the public should augment the disclosures required for other public financial reporting purposes.

As is true for any off-site surveillance system, the collection of advanced risk-based capital data is unlikely to capture the full range and complexity of bank activities. As a result, the agencies recognize that it will often not be possible to draw definitive conclusions from an analysis of data submissions without further follow-up through on-site supervisory activities. Nevertheless, the agencies believe that off-site analyses of the data described in this proposal would be helpful in focusing the activities of on-site examiners and deploying supervisory resources most effectively.

In developing this proposal, the agencies weighed several considerations. The factors the agencies considered included several trade-offs between reporting burden and the information needs of bank supervisors and market participants (for example, the level of reporting granularity necessary to produce meaningful comparisons of portfolio-level risks while minimizing reporting compliance costs and the potential for collected information to promote more informed decisions by market participants against the sensitive and confidential nature of risk estimates embedded within the advanced approaches). The agencies have also tried to anticipate and include data that meet their long-term data needs because comprehensive requests for data at the inception of a new reporting regime typically would be less costly to reporting institutions than the addition of items at a later date. The agencies believe this proposal appropriately balances these, and other, competing considerations.

The agencies are publishing the NPR and the regulatory reporting proposal described herein at the same time as their notice of proposed rulemaking for the Market Risk Framework and its associated regulatory reporting proposal so that the industry, and other interested parties, may assess the full impact of the proposed rules. Part of this assessment includes an understanding of the requirements of compliant data systems, including the ability to produce certain high-level capital information for the public and more detailed, but still aggregated, summary information about each bank's capital risk estimates to augment supervisory processes.

II. Scope and Frequency of Reporting

The proposed regulatory reporting requirements associated with the NPR described herein would apply, on a consolidated basis, to each BHC and each DI that qualifies for and applies the advanced approaches (see Part I, Section 1, of the proposed regulatory text in the NPR for a detailed description of the institutions covered by this notice) as well as to those banks in the parallel run stage of qualifying to use the advanced approaches (see Part III, Section 21(c) of the proposed regulatory text in the NPR). Reporting BHCs and DIs would submit data quarterly because efforts to monitor banks' progress toward, and actions under, the Advanced Capital Adequacy Framework require regular and consistent reports from all of the institutions adopting this framework.

The agencies expect that the report due dates for the proposal described herein would be the same as the report due dates currently required of banks, savings associations, and BHCs when filing their respective Call Report, TFR, or BHC FR Y-9C report. In addition, the agencies expect all banks to meet the existing reporting standards for accuracy and other requirements as currently mandated by their primary Federal supervisor.

The first reporting period for Schedules A through V for each reporting entity seeking to qualify for the advanced approaches would correspond to the first quarter of its parallel run period. All data collected from each reporting entity on Schedules A through V, including those data items identified as public data items below, would remain confidential during the entity's parallel run period. The data items identified below as public data elements would be available to the public for each reporting entity for data collected during reporting periods subsequent to the entity's parallel run period.

Reporting banks would be required to submit capital information under both this reporting proposal and under the existing risk-based capital reporting requirements during both the relevant parallel run period and subsequent transitional floor periods.[5] The purpose of this dual reporting requirement is threefold: (1) it would facilitate dialogue between supervisors and banks as banks bring their systems and data into compliance with supervisory expectations; (2) it would allow the agencies to monitor and ensure compliance with existing risk-based capital rules during the parallel run period and with those rules that would be in effect during subsequent transitional floor periods; and (3) it would aid in supervisors' development of comparisons of risk-based capital results between the Advanced Capital Adequacy Framework and the existing risk-based capital frameworks for individual institutions and for the banking industry in the aggregate.

III. Overview of the Data Collection Proposal

The agencies believe that banks would produce the data necessary to support supervisory analyses as part of their calculation of regulatory capital requirements. Accordingly, the regulatory reporting proposal requires certain data that would be publicly available and other data that would not be publicly available. Although this reporting proposal has not been designed to satisfy the NPR's Pillar 3 public disclosure requirements, banks may be able to use certain data items submitted through this proposal to help satisfy certain public disclosure requirements established in the Advanced Capital Adequacy Framework.

[5] See footnote 4.

A. Publicly Available Risk-Based Capital Data for the Advanced Approaches

Regulatory reporting disclosures that would be publicly available for data collected from a reporting bank during periods subsequent to its parallel run period comprise various aggregated portfolio drivers of reporting banks' risk-based capital levels. The intent of these disclosures is to provide market participants, depositors, supervisors, the public, and other interested parties with a sufficient level of detail (comparable, in principle, to risk-based capital information collected currently) about banks' major capital and risk-weighted asset components as well as summary information about the composition of regulatory capital and the risk parameters that underlie risk-weighted asset calculations.

Proposed Schedules A and B (and data items 1-7 of proposed Schedule V, Operational Risk) show the data items that would be publicly available for each reporting entity for reporting periods subsequent to its parallel run period. Schedule A contains information about the components of Tier 1 capital, Tier 2 capital, and adjustments to regulatory capital as defined within the NPR.[6] Schedule B contains summary information about risk-weighted assets by risk type, and, in the case of credit risk exposures, outstanding balances and aggregated information about the drivers and estimates that underlie the calculation of risk-weighted assets. The general exposure breakdowns in Schedule B are as follows: Wholesale Exposures (including separate reporting for the following types of exposures: Corporate; Bank; Sovereign; Construction Income Producing Real Estate; High Volatility Commercial Real Estate; Income Producing Real

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[6] One version of Schedule A would apply to banks and BHCs and another version of Schedule A would apply to savings associations. The version for banks and BHCs is modeled after the portion of the Call Report and BHC FR Y-9C report used to capture information on the components of and adjustments to Tier 1 and Tier 2 capital under the existing risk-based capital standards. Similarly, the version of Schedule A for savings associations is modeled after the portion of the TFR used to capture such information under the existing standards. In addition, to the extent the information collected in the Call Report, BHC FR Y-9C report, and TFR on the components of and adjustments to Tier 1 and Tier 2 capital under the existing standards is revised, e.g., for changes in the fair value of liabilities to which a fair value option is applied that are attributable to changes in a reporting entity's own creditworthiness, corresponding revisions would be made to Schedule A.

Estate; Eligible Margin Loans, Repo-Style Transactions, and OTC Derivatives with Cross Product Netting; Eligible Margin Loans, Repo-Style Transactions, and OTC Derivatives without Cross Product Netting); Retail Exposures (including separate reporting for the following types of exposures: Residential Mortgage Closed-end First Liens, Residential Mortgage Closed-end Junior Liens, Residential Mortgage Revolving Exposures, Qualifying Revolving Exposures Credit Cards, Qualifying Revolving Exposures All Other, Other Retail Small Business, and Other Retail All Other); Securitization Exposures; Equity Exposures; and Operational Risk. The aggregate data items submitted in Schedule B are derived from information contained in the more detailed confidential supporting schedules described below. The exposures and risk parameters used to calculate these aggregations would apply the definitions contained in the NPR. The data contained in Schedule B describe the main summary-level components of banks' risk-weighted assets, but would not allow users to exactly replicate banks' risk-weighted asset calculations since the data are averaged, weighted, and rounded.

B. Non-publicly Available Risk-Based Capital Data for the Advanced Approaches

The confidential data submitted in these schedules by each bank would be shared among the four agencies but would not be released to the public. Data items that would not be publicly available comprise additional, but still aggregated, detail about the main data items and drivers of reporting banks' risk-based capital levels. With respect to credit portfolios, the focus of these more detailed reports is to collect information at the level of supervisory PD bands that broadly reflect risk segments within each portfolio. The proposed reports would enable supervisors to conduct off-site assessments of banks' regulatory capital calculations, perform trend analyses of capital changes, conduct peer analyses of capital and risk parameters, and focus on-site examination efforts.

The data items contained in Schedules C through V describe the main components of banks' risk-weighted assets and are essentially expanded detail of the more summary information contained in the public data items shown in Schedule B. The data submitted in these schedules would not be made available to the public (except for data items 1-7 of Schedule V, Operational Risk, which are proposed to become public information for each reporting entity for data collected during periods subsequent to its parallel run reporting period). Supervisors are requesting these data to support comparisons of certain critical capital drivers across banks and across time. For the reasons cited previously, however, the information contained in the columns of the tables would not allow users to exactly replicate banks' risk-weighted asset calculations.

A brief description of the content of Schedules C through V follows. As with the publicly available information described above, the exposures and risk parameters used to calculate these aggregations would apply the definitions contained in the NPR.

Wholesale Exposures

Schedules C through K show data items within the wholesale exposure category that would be submitted under this proposal. Each schedule represents a sub-portfolio of the wholesale exposure category as listed on the public Schedule B. For each reported sub-portfolio, the schedule groups exposures into sub-portfolio segments using supervisor-defined PD ranges. The reported cells within these schedules then describe the main risk parameters and characteristics of each sub-portfolio segment.

Retail Exposures

Schedules L through R show data items within the retail exposure category that would be submitted under this proposal. Again, each schedule represents a sub-portfolio of the retail exposure category as listed on the public Schedule B. PD ranges are used to sub-divide each sub-portfolio into segments.[7] The reported cells within these schedules then describe the main risk parameters and characteristics of each sub-portfolio segment. The retail schedules also incorporate risk characteristics that are believed to be commonly used drivers within banks' risk management and measurement processes, including the distribution of each sub-portfolio segment by loan-to-value ranges (applies only to real estate exposures), weighted average credit bureau score, and weighted average account age.[8]

Securitization Exposures

Schedules S and T show data items within the securitization exposure class that would be submitted under this proposal. Schedule S provides information by rating categories about exposures subject to either the Ratings-Based Approach (RBA) or the Internal Assessment Approach (IAA). Schedule T provides certain memoranda information about unrated securitization exposures, exposures treated under the Supervisory Formula Approach, synthetic securitizations, and risk-weighted assets relating to early amortization features of securitizations as prescribed in the NPR.[9]

Equities

Schedule U provides information about a bank's equity exposures by type of exposure and by approach to measuring required capital. Schedule U also provides information on equity exposures subject to specific risk weights and equity exposures to investment funds. A bank would also complete the appropriate section of the schedule based on whether it uses a simple risk-weight approach, a full internal models approach, or a partially modeled approach to measuring required capital for equity exposures.

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[7] Unlike the wholesale credit exposure reporting schedules, the PD ranges for retail exposures differ from sub-portfolio to sub-portfolio.

[8] For qualifying and other non-mortgage retail exposures, the EAD of accounts under two years old is reported instead of weighted average age for each sub-portfolio exposure segment.

[9] Amounts are further broken down by retail and non-retail.

Operational Risk

Schedule V shows the data items within the operational risk exposure class that banks would submit under this proposal. Data items submitted in this schedule include various details about historical operational losses, on a stand-alone and group-wide basis, for the current reporting period and those historical operational losses used to model operational risk capital. The schedule also contains data items related to scenarios, distribution assumptions, and loss caps used to model operational risk capital.

IV. Request for Comment

Public comment is requested on all aspects of this joint notice. The agencies wish to encourage banks and other interested parties to comment on such matters as data availability, data alternatives, and reporting thresholds for each proposal for new data. The agencies are particularly interested in responses to the questions that follow relating to certain key aspects of the proposal and potential data collection alternatives.

(1) The agencies seek comment from the industry concerning the feasibility of collecting certain additional information beyond that described in this proposal. The purpose of this additional information is to help identify the causes of changes in credit risk regulatory capital requirements (for example, due to changes in exposure mix or changes in the bank's assessment of risk).

To facilitate such analyses, reporting banks would be required to submit additional data items that summarize current and previous risk parameters for exposures that were in wholesale and retail credit portfolios as of the previous reporting period (for example, prior quarter, prior year) -- the "lookback" portfolio. The intent of this lookback-portfolio approach would be to allow the agencies to better identify reasons for observed changes in regulatory credit risk capital requirements and allow for peer comparisons of changes from period to period.

A lookback-portfolio approach would require additional data collection and processing. For example, banks would need to retain data on the internal risk rating category to which each exposure was previously assigned, and the previous EAD of each exposure. The agencies believe that this data maintenance requirement is consistent with supervisory expectations described in the NPR and proposed AIRB guidance in that banks subject to the Advanced Capital Adequacy Framework are expected to be able to evaluate and explain changes in risk parameters in order to assess their risk parameter estimation procedures.

The agencies specifically seek industry comment on the following questions:

- What aggregate summary information might banks submit that best describes or characterizes period-to-period migration across internal rating grades or retail segments?
- If such information were required, are there particular formats or other considerations that would reduce the reporting burden for banks?

(2) The agencies are considering another alternative reporting treatment with respect to the wholesale and retail portions of the above proposal (Schedules C-R). This alternative treatment would complement the lookback-portfolio approach just described but could be implemented whether or not the lookback-portfolio approach was implemented. Under this approach, banks would submit data according to each of their internal obligor rating grades or segments, rather than in the fixed bands defined in the current regulatory reporting proposal. In this case, each reporting bank could submit a different number of rows corresponding to the

number of internal risk rating/segmentation categories employed by that bank for the given portfolio.

The agencies specifically seek industry comment on the following question:

- Would reporting burden be lessened if banks submitted data using internally-defined obligor grades or segments, rather than aggregating the grades or segments in supervisory reporting bands?

(3) The agencies request comment on the appropriateness of making the data items on Schedules A and B and data items 1 through 7 of the operational risk reporting schedule (Schedule V) available to the public for each reporting entity for data collected during periods subsequent to its parallel run reporting periods as currently proposed. Comments are requested on the extent to which banks are already providing these data to the public or are planning to make such data public as well as the timing of these disclosures. In addition, comments are requested on the perceived risks associated with public reporting of these data items.

(4) What changes in the proposed regulatory reporting requirements for the Advanced Capital Adequacy Framework, including additional data or definitions, would better assist the agencies in reaching their stated goals? In this regard, the agencies also seek input on possible alternative ways to capture the requested information and the appropriateness of the requested data given the stated purposes of the information collections and the associated reporting burden.

<u>Paperwork Reduction Act</u>

The agencies seek comment on:

(a) Whether the proposed collections of information are necessary for the proper performance of the agencies' functions, including whether the information has practical utility;

(b) The accuracy of the agencies' estimates of the burden of the proposed information collections, including the validity of the methodology and assumptions used;

(c) Ways to enhance the quality, utility, and clarity of the information to be collected;

(d) Ways to minimize the burden of the information collections on respondents, including through the use of automated collection techniques or other forms of information technology; and

(e) Estimates of capital or start up costs and costs of operation, maintenance, and purchase of services to provide information.

Comments submitted in response to this joint notice will be shared among the agencies and will be summarized or included in the agencies' requests for OMB approval. All comments will become a matter of public record.

[THIS SIGNATURE PAGE PERTAINS TO THE JOINT NOTICE AND REQUEST FOR COMMENT, “AGENCY INFORMATION COLLECTION ACTIVITIES; COMMENT REQUEST”]

Dated: ____________________________________

Stuart E. Feldstein,
Assistant Director, Legislative and Regulatory Activities Division,
Office of the Comptroller of the Currency.

[THIS SIGNATURE PAGE PERTAINS TO THE JOINT NOTICE AND REQUEST FOR COMMENT, “AGENCY INFORMATION COLLECTION ACTIVITIES; COMMENT REQUEST”]

Board of Governors of the Federal Reserve System, __________________________, 2006.

Jennifer J. Johnson
Secretary of the Board.

[THIS SIGNATURE PAGE PERTAINS TO THE JOINT NOTICE AND REQUEST FOR COMMENT, “AGENCY INFORMATION COLLECTION ACTIVITIES; COMMENT REQUEST”]

Dated at Washington, D.C., this _______ day of __________________, 2006.

FEDERAL DEPOSIT INSURANCE CORPORATION

Robert E. Feldman
Executive Secretary

[THIS SIGNATURE PAGE PERTAINS TO THE JOINT NOTICE AND REQUEST FOR COMMENT, "AGENCY INFORMATION COLLECTION ACTIVITIES; COMMENT REQUEST"]

Dated: ___________________________________

____

Deborah Dakin,
Senior Deputy Chief Counsel,
Regulations and Legislation Division,
Office of Thrift Supervision.

Billing Codes
OCC: 4810-33-P 1/4
Board: 6210-01-P 1/4
FDIC: 6714-01-P 1/4
OTS: 6720-01-P 1/4

Reporting Under the Advanced Internal Ratings-Based and Advanced Measurement Approaches

Schedules A through V

Schedule A - ADVANCED RISK-BASED CAPITAL (Calculation of Numerator and Ratios for banks and bank holding companies)

Tier 1 capital

1. Total equity capital ....
2. LESS: Net unrealized gains (losses) on available-for-sale securities[1] (if a gain, report as a positive value; if a loss, report as a negative value) ....
3. LESS: Net unrealized loss on available-for-sale **EQUITY** securities[1] (report loss as a **positive** value) ....
4. LESS: Accumulated net gains (losses) on cash flow hedges[1] (if a gain, report as a positive value; if a loss, report as a negative value) ....
5. LESS: Nonqualifying perpetual preferred stock ....
6. Qualifying minority interests in consolidated subsidiaries ....
7. LESS: Disallowed goodwill and other disallowed intangible assets ....
8. Subtotal (sum of items 1 and 6, less items 2, 3, 4, 5, and 7) ....
9. a. LESS: Disallowed servicing assets and purchased credit card relationships ....
   b. LESS: Disallowed deferred tax assets …………………………………………………………
   c. LESS: Shortfall of eligible credit reserves below total expected credit losses (50% of shortfall plus tier 2 carryover)* ……………………………………………………………………
   d. LESS: Gain-on-sale associated with securitization exposures………………………………
   e. LESS: Certain failed capital markets transactions (50% of deductions plus tier 2 carryover)*
   f. LESS: Other securitization deductions (50% of deductions plus tier 2 carryover)* .... ……………………………………………
10. Other additions to (deductions from) Tier 1 capital ....
11. Tier 1 capital (sum of items 8 and 10, less items 9.a through 9.f) ....

Tier 2 capital

12. Qualifying subordinated debt and redeemable preferred stock ....
13. Qualifying cumulative perpetual preferred stock includible in Tier 2 capital ....
14. Excess of eligible credit reserves over total expected credit losses (up to .60% of credit risk-weighted assets)** ....
15. Unrealized gains on available-for-sale equity securities includible in Tier 2 capital ....
16. Other additions to (deductions from) Tier 2 capital ....
17. Adjustments to Tier 2 capital
    a. LESS: Shortfall of eligible credit reserves below total expected credit losses (up to lower of 50% of the shortfall or amount of tier 2 capital).……………………………………
    b. LESS: Certain failed capital markets transactions (up to the lower of 50% of shortfall or amount of tier 2 capital)……………………………………………
    c. LESS: Other securitization deductions (up to lower of 50% of shortfall or amount of tier 2 capital) ……………………………………………………………………………
18. Tier 2 capital (sum of items 12 through 16, less item 17.a through 17.c)……………………………
19. Allowable Tier 2 capital (lesser of item 11 or 18) ....
20. Tier 3 capital allocated for market risk..
21. LESS: Deductions from total risk-based capital.………………………………………………………
22. Total risk-based capital (sum of items 11, 19, 20, less item 21) ....

Total assets for leverage ratio

23. Average total assets ....
24. LESS: Disallowed goodwill and other disallowed intangible assets (from item 7 above) ....
25. LESS: Disallowed servicing assets and purchased credit card relationships (from item 9.a above)
26. LESS: Disallowed deferred tax assets (from item 9.b above) ....
27. LESS: Other deductions from assets for leverage capital purposes ....
28. Average total assets for leverage capital purposes (item 23 less items 24 through 27) ....

Adjustments for financial subsidiaries

29. a. Adjustment to Tier 1 capital reported in item 11 ....
    b. Adjustment to total risk-based capital reported in item 22..
30. Adjustment to risk-weighted assets ....
31. Adjustment to average total assets reported in item 28 ....

Capital ratios
(Column B is to be completed by all banks. Column A is to be completed by banks with financial subsidiaries.)

	(Column A) Percentage	(Column B) Percentage
32. Tier 1 leverage ratio[2] …………………………………………….		
33. Tier 1 risk-based capital ratio[3]		
34. Total risk-based capital ratio[4]		

35. Eligible credit reserves………………………………………..	
36. Total expected credit losses………………………………………..	

*Tier 2 carryover is the amount by which 50% of the deductions (i) for the shortfall of eligible credit reserves below total expected credit losses or (ii) certain failed capital markets transactions, or (iii) other securitization deductions exceed actual tier 2 capital.

** The term credit risk weighted assets for purposes of computing the amount of excess eligible credit reserves includable in tier 2 capital refers to the sum of: (i) total wholesale and retail risk-weighted assets; (ii) risk-weighted assets for securitization exposures; and (iii) risk-weighted assets for equity exposures.

1 Report amount included in Schedule RC of the Call Report, item 26.b, "Accumulated other comprehensive income."
2 The ratio for column B is item 11 divided by item 28. The ratio for column A is item 11 minus item 29.a divided by (item 28 minus item 31).
3 The ratio for column B is item 11 divided by total risk-weighted assets (Schedule B, item 31). The ratio for column A is item 11 minus item 29.a divided by (Schedule B, item 31, minus item 30).
4 The ratio for column B is item 22 divided by total risk-weighted assets (Schedule B, item 31). The ratio for column A is item 22 minus item 29.b divided by (Schedule B, item 31, minus item 30).

Schedule B

Summary Risk-weighted Asset Information for Banks Approved to Use Advanced Internal Ratings-Based and Advanced Measurement Approaches for Regulatory Capital Purposes

	Exposure Category	Non-Defaulted and Defaulted Exposures							
		A Weighted Average Probability of Default* (%)	B Balance Sheet Amount ** ($)	C Total Undrawn Amount ($)	D Exposure at Default ($)	E Weighted Average Maturity (Years)	F Wtd Avg LDG after consideration of eligible guarantees and credit derivatives (%)	G Risk Weighted Assets*** ($)	H Expected Credit Loss ($)
	Wholesale Exposures								
1	Corporate								
2	Bank								
3	Sovereign								
4	Construction IPRE								
5	HVCRE								
6	IPRE								
7	Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting - EAD Adjusted								
8	Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting - LGD Adjusted								
9	Eligible margin loans, repo-style transactions - No Cross Product Netting - EAD Adjusted								
10	Eligible margin loans, repo-style transactions - No Cross Product Netting - LGD Adjusted								
11	OTC Derivatives - No Cross Product Netting - EAD Adjusted								
12	OTC Derivatives - No Cross Product Netting - LGD Adjusted								
	Retail Exposures								
	Residential Mortgage Exposures								
13	Closed-end First Lien Exposures								
14	Closed-end Junior Lien Exposures								
15	Revolving Exposures								
	Qualifying Revolving Exposures								
16	Credit Cards								
17	All Other								
	Other Retail Exposures								
18	Small Business								
19	All Other								
	Securitization Exposures								
20	Subject to Ratings-based Approach								
21	Subject to Internal Assessment Approach								
22	Subject to the Supervisory Formula								
23	Investors' Interest Subject to Early Amortization Charge								
	Equity Exposures								
24	Excluded from Simple Risk Weight Method or Internal Models Approach								
25	Simple Risk Weight Method								
26	Internal Models Approach								
27	**Market Risk Equivalent Assets**								
28	**Operational Risk**								
	Other Assets								
29	Assets Not Subject to the Internal Ratings-Based Approach								
30	Immaterial Exposures								
31	**TOTAL**								

*** In estimating weighted average PD for wholesale exposures, do not include effects of credit risk mitigation (guarantees, credit derivatives and collateral).**
**** For securitization exposures, report the total dollar amount of exposures outstanding.**
***** Reported Risk Weighted Assets cannot be calculated for some exposure types from the data provided.**

Wholesale Exposure - Schedule C - Corporate

	PD Range (%)	A Weighted Average Obligor PD* (%)	B Number of Obligors	C Balance Sheet Amount ($)	D Total Undrawn Amount ($)	E EAD ($)	F Weighted Average Maturity (Years)	G1 Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	G2 Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	H1 Effect of PD substitution and LGD adjustment approaches on RWA ($)	H2 Effect of Double Default Treatment on RWA ($)	I Risk Weighted Assets Post-CRM*** ($)	J Expected Credit Loss ($)
1	<0.15												
2	0.15 to < 0.25												
3	0.25 to < 0.35												
4	0.35 to < 0.50												
5	0.50 to< 0.75												
6	0.75 to < 1.35												
7	1.35 to < 2.5												
8	2.5 to < 5.5												
9	5.5 to < 10												
10	10 to < 20												
11	20 to < 100												
12	100 (default)	100											
13	TOTAL **	wtd avg	sum	sum	sum	sum	wtd avg	wtd avg	wtd avg	sum	sum	sum	sum

14	Risk Weighted Assets associated with immaterial exposures not included above	
15	Subcategory weighted average Expected LGD****	

* In estimating obligor PD, do not include effects of credit risk mitigation (guarantees, credit derivatives and collateral).
** Cells in line 13 are calculated.
*** Not calculated from previous column entries.
**** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Wholesale Exposure - Schedule D - Bank

	PD Range (%)	A Weighted Average Obligor PD* (%)	B Number of Obligors	C Balance Sheet Amount ($)	D Total Undrawn Amount ($)	E EAD ($)	F Weighted Average Maturity (Years)	G1 Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	G2 Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	H Effect of PD substitution and LGD adjustment approaches on RWA ($)	I Risk Weighted Assets Post-CRM*** ($)	J Expected Credit Loss ($)
1	<0.15											
2	0.15 to < 0.25											
3	0.25 to < 0.35											
4	0.35 to < 0.50											
5	0.50 to< 0.75											
6	0.75 to < 1.35											
7	1.35 to < 2.5											
8	2.5 to < 5.5											
9	5.5 to < 10											
10	10 to < 20											
11	20 to < 100											
12	100 (default)	100										
13	TOTAL**	wtd avg	sum	sum	sum	sum	wtd avg	wtd avg	wtd avg	sum	sum	sum

14	Risk Weighted Assets associated with immaterial exposures not included above	
15	Subcategory weighted average Expected LGD****	

* In estimating obligor PD, do not include effects of credit risk mitigation (guarantees, credit derivatives and collateral).
** Cells in line 13 are calculated.
*** Not calculated from previous column entries.
**** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Wholesale Exposure - Schedule E - Sovereign

	PD Range (%)	A Weighted Average Obligor PD* (%)	B Number of Obligors	C Balance Sheet Amount ($)	D Total Undrawn Amount ($)	E EAD ($)	F Weighted Average Maturity (Years)	G1 Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	G2 Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	H Effect of PD substitution and LGD adjustment approaches on RWA ($)	I Risk Weighted Assets Post-CRM*** ($)	J Expected Credit Loss ($)
1	<0.15											
2	0.15 to < 0.25											
3	0.25 to < 0.35											
4	0.35 to < 0.50											
5	0.50 to< 0.75											
6	0.75 to < 1.35											
7	1.35 to < 2.5											
8	2.5 to < 5.5											
9	5.5 to < 10											
10	10 to < 20											
11	20 to < 100											
12	100 (default)	100										
13	TOTAL**	wtd avg	sum	sum	sum	sum	wtd avg	wtd avg	wtd avg	sum	sum	sum

14	Risk Weighted Assets associated with immaterial exposures not included above	
15	Subcategory weighted average Expected LGD****	

* In estimating obligor PD, do not include effects of credit risk mitigation (guarantees, credit derivatives and collateral).
** Cells in line 13 are calculated.
*** Not calculated from previous column entries.
**** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Wholesale Exposure - Schedule F - Construction IPRE

	PD Range (%)	A Weighted Average Obligor PD* (%)	B Number of Obligors	C Balance Sheet Amount ($)	D Total Undrawn Amount ($)	E EAD ($)	F Weighted Average Maturity (Years)	G1 Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	G2 Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	H1 Effect of PD substitution and LGD adjustment approaches on RWA ($)	H2 Effect of Double Default Treatment on RWA ($)	I Risk Weighted Assets Post-CRM*** ($)	J Expected Credit Loss ($)
1	<0.15												
2	0.15 to < 0.25												
3	0.25 to < 0.35												
4	0.35 to < 0.50												
5	0.50 to< 0.75												
6	0.75 to < 1.35												
7	1.35 to < 2.5												
8	2.5 to < 5.5												
9	5.5 to < 10												
10	10 to < 20												
11	20 to < 100												
12	100 (default)	100											
13	TOTAL**	wtd avg	sum	sum	sum	sum	wtd avg	wtd avg	wtd avg	sum	sum	sum	sum

14	Risk Weighted Assets associated with immaterial exposures not included above	
15	Subcategory weighted average Expected LGD****	

* In estimating obligor PD, do not include effects of credit risk mitigation (guarantees, credit derivatives and collateral).
** Cells in line 13 are calculated.
*** Not calculated from previous column entries.
**** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Wholesale Exposure - Schedule G - HVCRE

	PD Range (%)	A Weighted Average Obligor PD* (%)	B Number of Obligors	C Balance Sheet Amount ($)	D Total Undrawn Amount ($)	E EAD ($)	F Weighted Average Maturity (Years)	G1 Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	G2 Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	H1 Effect of PD substitution and LGD adjustment approaches on RWA ($)	H2 Effect of Double Default Treatment on RWA ($)	I Risk Weighted Assets Post-CRM*** ($)	J Expected Credit Loss ($)
1	<0.15												
2	0.15 to < 0.25												
3	0.25 to < 0.35												
4	0.35 to < 0.50												
5	0.50 to< 0.75												
6	0.75 to < 1.35												
7	1.35 to < 2.5												
8	2.5 to < 5.5												
9	5.5 to < 10												
10	10 to < 20												
11	20 to < 100												
12	100 (default)	100											
13	TOTAL**	wtd avg	sum	sum	sum	sum	wtd avg	wtd avg	wtd avg	sum	sum	sum	sum

14	Risk Weighted Assets associated with immaterial exposures not included above	
15	Subcategory weighted average Expected LGD****	

* In estimating obligor PD, do not include effects of credit risk mitigation (guarantees, credit derivatives and collateral).
** Cells in line 13 are calculated.
*** Not calculated from previous column entries.
**** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Wholesale Exposure - Schedule H - IPRE

		A	B	C	D	E	F	G1	G2	H1	H2	I	J
	PD Range (%)	Weighted Average Obligor PD* (%)	Number of Obligors	Balance Sheet Amount ($)	Total Undrawn Amount ($)	EAD ($)	Weighted Average Maturity (Years)	Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	Effect of PD substitution and LGD adjustment approaches on RWA ($)	Effect of Double Default Treatment on RWA ($)	Risk Weighted Assets Post-CRM*** ($)	Expected Credit Loss ($)
1	<0.15												
2	0.15 to < 0.25												
3	0.25 to < 0.35												
4	0.35 to < 0.50												
5	0.50 to< 0.75												
6	0.75 to < 1.35												
7	1.35 to < 2.5												
8	2.5 to < 5.5												
9	5.5 to < 10												
10	10 to < 20												
11	20 to < 100												
12	100 (default)	100											
13	TOTAL**	wtd avg	sum	sum	sum	sum	wtd avg	wtd avg	wtd avg	sum	sum	sum	sum

14	Risk Weighted Assets associated with immaterial exposures not included above	
15	Subcategory weighted average Expected LGD****	

* In estimating obligor PD, do not include effects of credit risk mitigation (guarantees, credit derivatives and collateral).
** Cells in line 13 are calculated.
*** Not calculated from previous column entries.
**** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Wholesale Exposure Schedule I - Eligible Margin Loans, Repo-Style Transactions and OTC Derivatives *WITH CROSS-PRODUCT NETTING*

	PD Range (%)	Exposures with EAD Adjustment								Exposures with LGD Adjustment						
		A	B	C	D	E	F	G		H	I	J	K	L	M	N
		Weighted Average PD (%)	Number of Counterparties	Weighted Average Maturity (Years)	EAD ($)	Weighted Average LGD (%)	Risk Weighted Assets Post-CRM* ($)	Expected Credit Losses ($)		Weighted Average PD (%)	Number of Counterparties	Weighted Average Maturity (Years)	EAD ($)	Weighted Average LGD (%)	Risk Weighted Assets Post-CRM* ($)	Expected Credit Losses ($)
1	0.00 to < 0.03															
2	0.03 to < 0.05															
3	0.05 to < 0.10															
4	0.10 to < 0.25															
5	0.25 to < 0.50															
6	0.50 to < .75															
7	0.75 to < 1.35															
8	1.35 to < 2.50															
9	2.50 to < 5.50															
10	5.50 to < 10.00															
11	10.00 to < 100.00															
12	100 (default)	100														
13	TOTAL	wtd ave	sum	wtd ave	sum	sum	sum	sum		wtd ave	sum	wtd ave	sum	sum	sum	sum

Report all Eligible Margin Loans and OTC derivatives wherever booked provided that a cross product netting agreement is in place. Do not include credit default swaps or total rate of return swaps used to hedge assets.
* Not calculated from previous column entries.

Wholesale Exposure Schedule J - Eligible Margin Loans and Repo-Style Transactions

	PD Range (%)	Exposures with EAD Adjustment								Exposures with LGD Adjustment						
		A	B	C	D	E	F	G		H	I	J	K	L	M	N
		Weighted Average PD (%)	Number of Counterparties	Weighted Average Maturity (Years)	EAD ($)	Weighted Average LGD (%)	Risk Weighted Assets Post-CRM* ($)	Expected Credit Losses ($)		Weighted Average PD (%)	Number of Counterparties	Weighted Average Maturity (Years)	EAD ($)	Weighted Average LGD (%)	Risk Weighted Assets Post-CRM* ($)	Expected Credit Losses ($)
1	0.00 to < 0.03															
2	0.03 to < 0.05															
3	0.05 to < 0.10															
4	0.10 to < 0.25															
5	0.25 to < 0.50															
6	0.50 to < .75															
7	0.75 to < 1.35															
8	1.35 to < 2.50															
9	2.50 to < 5.50															
10	5.50 to < 10.00															
11	10.00 to < 100.00															
12	100 (default)	100														
13	TOTAL	wtd ave	sum	wtd ave	sum	sum	sum	sum		wtd ave	sum	wtd ave	sum	sum	sum	sum

	O	M1	M2	M3
	Adjustment Method (%): EAD	Collateral Haircut	Simple VaR	Internal Models
14				

Report all Eligible Margin Loan transactions wherever booked.
* Not calculated from previous column entries.

Wholesale Exposure Schedule K - OTC Derivatives

		Exposures with EAD Adjustment								Exposures with LGD Adjustment						
		A	B	C	D	E	F	G		H	I	J	K	L	M	N
	PD Range (%)	Weighted Average PD (%)	Number of Counterparties	Weighted Average Maturity (Years)	EAD ($)	Weighted Average LGD (%)	Risk Weighted Assets Post-CRM* ($)	Expected Credit Losses ($)		Weighted Average PD (%)	Number of Counterparties	Weighted Average Maturity (Years)	EAD ($)	Weighted Average LGD (%)	Risk Weighted Assets Post-CRM* ($)	Expected Credit Losses ($)
1	0.00 to < 0.03															
2	0.03 to < 0.05															
3	0.05 to < 0.10															
4	0.10 to < 0.25															
5	0.25 to < 0.50															
6	0.50 to < .75															
7	0.75 to < 1.35															
8	1.35 to < 2.50															
9	2.50 to < 5.50															
10	5.50 to < 10.00															
11	10.00 to < 100.00															
12	100 (default)	100														
13	TOTAL	wtd ave	sum	wtd ave	sum	sum	sum	sum		wtd ave	sum	wtd ave	sum	sum	sum	sum

	O	EAD	M1	M2
	Adjustment Method (%):		Collateral Haircut	Internal Models
14				

Report all OTC derivatives wherever booked. Do not include credit default swaps or total rate of return swaps used to hedge assets.
* Not calculated from previous column entries.

Retail Exposure - Schedule L - Residential Mortgage - Closed-end First Lien Exposures

												LTV*						
		A	B	C	D	E	F	G1	G2	H	I	J	K	L	M	N	O	P
	PD Range (%)	Weighted Average PD (%)	Number of Accounts	Total Balance Sheet Amount ($)	Total Undrawn Amount ($)	EAD ($)	Weighted Average Age (Months)	Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	Risk Weighted Assets*** ($)	Expected Credit Loss ($)	Less Than 70% ($)	At Least 70% but less than 80% ($)	At Least 80% but less than 90% ($)	At Least 90% but not more than 100% ($)	100%+ ($)	Weighted Average Bureau Score	EAD of Accounts with Updated LTV****
1	0.00 to < 0.05																	
2	0.05 to < 0.10																	
3	0.10 to < 0.15																	
4	0.15 to < 0.20																	
5	0.20 to < 0.25																	
6	0.25 to < 0.35																	
7	0.35 to < 0.50																	
8	0.50 to < 0.75																	
9	0.75 to < 1.35																	
10	1.35 to < 2.50																	
11	2.50 to < 5.50																	
12	5.50 to < 10.00																	
13	10.00 to < 20.00																	
14	20.00 to < 100																	
15	100 Default	100																
16	TOTAL **	wtd avg	sum	sum	sum	sum	wtd avg	wtd avg	wtd avg	sum	sum	sum	sum	sum	sum	sum	wtd avg	sum

17	Risk Weighted Assets associated with immaterial exposures not included above	
18	Subcategory weighted average Expected LGD*****	
19	Credit scores shown in Column O are from which credit scoring system(s)?	

* LTV cell values are cumulative EAD totals. LTV values are calculated by combining any junior lien amounts with the exposure amounts applicable to this report.

** Cells in line 16 are calculated.

*** Not calculated from previous column entries.

**** Report the EAD of accounts that are included in the segments reported in this row where the LTV has been updated since the last report date for portfolio management purposes, that is, the updated LTV is based upon a refreshed assessment of the collateral value. If LTVs were not updated for any accounts in the segments reported in the row since the last report date, report 0.

***** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Retail Exposure - Schedule M - Residential Mortgage - Closed-end Junior Lien Exposures

												LTV*						
		A	B	C	D	E	F	G1	G2	H	I	J	K	L	M	N	O	P
	PD Range (%)	Weighted Average PD (%)	Number of Accounts	Total Balance Sheet Amount ($)	Total Undrawn Amount ($)	EAD ($)	Weighted Average Age (Months)	Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	Risk Weighted Assets*** ($)	Expected Credit Loss ($)	Less Than 70% ($)	At Least 70% but less than 80% ($)	At Least 80% but less than 90% ($)	At Least 90% but not more than 100% ($)	100%+ ($)	Weighted Average Bureau Score	EAD of Accounts with Updated LTV****
1	0.00 to < 0.05																	
2	0.05 to < 0.10																	
3	0.10 to < 0.15																	
4	0.15 to < 0.20																	
5	0.20 to < 0.25																	
6	0.25 to < 0.35																	
7	0.35 to < 0.50																	
8	0.50 to < 0.75																	
9	0.75 to < 1.35																	
10	1.35 to < 2.50																	
11	2.50 to < 5.50																	
12	5.50 to < 10.00																	
13	10.00 to < 20.00																	
14	20.00 to < 100																	
15	100 Default	100																
16	TOTAL **	wtd avg	sum	sum	sum	sum	wtd avg	wtd avg	wtd avg	sum	sum	sum	sum	sum	sum	sum	wtd avg	sum

17	Risk Weighted Assets associated with immaterial exposures not included above	
18	Subcategory weighted average Expected LGD*****	
19	Credit scores shown in Column O are from which credit scoring system(s)?	

* LTV cell values are cumulative EAD totals. LTV values are calculated by combining any junior lien amounts with the exposure amounts applicable to this report.

** Cells in line 16 are calculated.

*** Not calculated from previous column entries.

**** Report the EAD of accounts that are included in the segments reported in this row where the LTV has been updated since the last report date for portfolio management purposes, that is, the updated LTV is based upon a refreshed assessment of the collateral value. If LTVs were not updated for any accounts in the segments reported in the row since the last report date, report 0.

***** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Retail Exposure - Schedule N - Residential Mortgage - Revolving Exposures

		A	B	C	D	E	F	G1	G2	H	I		J	K	L	M	N	O	P
													LTV*						
	PD Range (%)	Weighted Average PD (%)	Number of Accounts	Total Balance Sheet Amount ($)	Total Undrawn Amount ($)	EAD ($)	Weighted Average Age (Months)	Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	Risk Weighted Assets*** ($)	Expected Credit Loss ($)		Less Than 70% ($)	At Least 70% but less than 80% ($)	At Least 80% but less than 90% ($)	At Least 90% but not more than 100% ($)	100%+ ($)	Weighted Average Bureau Score	EAD of Accounts with Updated LTV****
1	0.00 to < 0.05																		
2	0.05 to < 0.10																		
3	0.10 to < 0.15																		
4	0.15 to < 0.20																		
5	0.20 to < 0.25																		
6	0.25 to < 0.35																		
7	0.35 to < 0.50																		
8	0.50 to < 0.75																		
9	0.75 to < 1.35																		
10	1.35 to < 2.50																		
11	2.50 to < 5.50																		
12	5.50 to < 10.00																		
13	10.00 to < 20.00																		
14	20.00 to < 100																		
15	100 Default	100																	
16	TOTAL **	wtd avg	sum	sum	sum	sum	wtd avg	wtd avg	wtd avg	sum	sum		sum	sum	sum	sum	sum	wtd avg	sum

17	Risk Weighted Assets associated with immaterial exposures not included above	
18	Subcategory weighted average Expected LGD*****	
19	Credit scores shown in Column O are from which credit scoring system(s)?	

* LTV cell values are cumulative EAD totals. LTV values are calculated by combining any junior lien amounts with the exposure amounts applicable to this report.
** Cells in line 16 are calculated.
*** Not calculated from previous column entries.
**** Report the EAD of accounts that are included in the segments reported in this row where the LTV has been updated since the last report date for portfolio management purposes, that is, the updated LTV is based upon a refreshed assessment of the collateral value. If LTVs were not updated for any accounts in the segments reported in the row since the last report date, report 0.
***** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Retail Exposure - Schedule O - Qualifying Revolving Exposures - Credit Cards

		A	B	C	D	E	F	G1	G2	H	I	J
	PD Range (%)	Weighted Average PD (%)	Number of Accounts	Total Balance Sheet Amount ($)	Total Undrawn Amount ($)	EAD ($)	EAD of Accounts < Two Years Old ($)	Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	Risk Weighted Assets** ($)	Expected Credit Loss ($)	Weighted Average Bureau Score
1	0.00 to < 0.50											
2	0.50 to < 1.00											
3	1.00 to < 1.50											
4	1.50 to < 2.00											
5	2.00 to < 2.50											
6	2.50 to < 3.00											
7	3.00 to < 3.50											
8	3.50 to < 4.00											
9	4.00 to < 5.00											
10	5.00 to < 6.00											
11	6.00 to < 7.00											
12	7.00 to < 8.00											
13	8.00 to < 10.00											
14	10.00 to < 100											
15	100 Default	100										
16	TOTAL *	wtd avg	sum	sum	sum	sum	sum	wtd avg	wtd avg	sum	sum	wtd avg

17	Risk Weighted Assets associated with immaterial exposures not included above	
18	Subcategory weighted average Expected LGD***	
19	Credit scores shown in Column J are from which credit scoring system(s)?	

* Cells in line 16 are calculated.
** Not calculated from previous column entries.
*** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Retail Exposure - Schedule P - Qualifying Revolving Exposures - All Other

	PD Range (%)	A Weighted Average PD (%)	B Number of Accounts	C Total Balance Sheet Amount ($)	D Total Undrawn Amount ($)	E EAD ($)	F EAD of Accounts < Two Years Old ($)	G1 Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	G2 Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	H Risk Weighted Assets** ($)	I Expected Credit Loss ($)		J Weighted Average Bureau Score
1	0.00 to < 0.50												
2	0.50 to < 1.00												
3	1.00 to < 1.50												
4	1.50 to < 2.00												
5	2.00 to < 2.50												
6	2.50 to < 3.00												
7	3.00 to < 3.50												
8	3.50 to < 4.00												
9	4.00 to < 5.00												
10	5.00 to < 6.00												
11	6.00 to < 7.00												
12	7.00 to < 8.00												
13	8.00 to < 10.00												
14	10.00 to < 100												
15	100 Default	100											
16	TOTAL *	wtd avg	sum	sum	sum	sum	sum	wtd avg	wtd avg	sum	sum		wtd avg

17	Risk Weighted Assets associated with immaterial exposures not included above	
18	Subcategory weighted average Expected LGD***	
19	Credit scores shown in Column J are from which credit scoring system(s)?	

* Cells in line 16 are calculated.
** Not calculated from previous column entries.
*** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Retail Exposure - Schedule Q - Other Retail Exposures - Small Business

		A	B	C	D	E	F	G1	G2	H	I		J
	PD Range (%)	Weighted Average PD (%)	Number of Accounts	Total Balance Sheet Amount ($)	Total Undrawn Amount ($)	EAD ($)	EAD of Accounts < Two Years Old ($)	Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	Risk Weighted Assets** ($)	Expected Credit Loss ($)		Weighted Average Bureau Score
1	0.00 to < 0.50												
2	0.50 to < 1.00												
3	1.00 to < 1.50												
4	1.50 to < 2.00												
5	2.00 to < 2.50												
6	2.50 to < 3.00												
7	3.00 to < 3.50												
8	3.50 to < 4.00												
9	4.00 to < 5.00												
10	5.00 to < 6.00												
11	6.00 to < 7.00												
12	7.00 to < 8.00												
13	8.00 to < 10.00												
14	10.00 to < 100												
15	100 Default	100											
16	TOTAL *	wtd avg	sum	sum	sum	sum	sum	wtd avg	wtd avg	sum	sum		wtd avg

17	Risk Weighted Assets associated with immaterial exposures not included above	
18	Subcategory weighted average Expected LGD***	
19	Credit scores shown in Column J are from which credit scoring system(s)?	

* Cells in line 16 are calculated.
** Not calculated from previous column entries.
*** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Retail Exposure - Schedule R - Other Retail Exposures - All Other

	PD Range (%)	A Weighted Average PD (%)	B Number of Accounts	C Total Balance Sheet Amount ($)	D Total Undrawn Amount ($)	E EAD ($)	F EAD of Accounts < Two Years Old ($)	G1 Weighted Average LGD before consideration of eligible guarantees and credit derivatives (%)	G2 Weighted Average LGD after consideration of eligible guarantees and credit derivatives (%)	H Risk Weighted Assets** ($)	I Expected Credit Loss ($)		J Weighted Average Bureau Score
1	0.00 to < 0.50												
2	0.50 to < 1.00												
3	1.00 to < 1.50												
4	1.50 to < 2.00												
5	2.00 to < 2.50												
6	2.50 to < 3.00												
7	3.00 to < 3.50												
8	3.50 to < 4.00												
9	4.00 to < 5.00												
10	5.00 to < 6.00												
11	6.00 to < 7.00												
12	7.00 to < 8.00												
13	8.00 to < 10.00												
14	10.00 to < 100												
15	100 Default	100											
16	TOTAL *	wtd avg	sum	sum	sum	sum	sum	wtd avg	wtd avg	sum	sum		wtd avg

17	Risk Weighted Assets associated with immaterial exposures not included above	
18	Subcategory weighted average Expected LGD***	
19	Credit scores shown in Column J are from which credit scoring system(s)?	

* Cells in line 16 are calculated.
** Not calculated from previous column entries.
*** Report weighted average ELGD only if using own internal estimates of LGD. Otherwise, do not report.

Securitization - Schedule S - Exposures Subject to the Ratings-Based or Internal Assessment Approaches

	Rating Category	A Exposures Subject to the RBA	B Exposures Subject to the Internal Assessment Approach	C RWA
1	Exposures with Highest or Second-Highest Investment Grade Long-Term Credit Rating or Highest Investment Grade Short-Term Credit Rating			
2	Exposures with Third-Highest Investment Grade Long Term Credit Rating or Second-Highest Investment Grade Short-Term Credit Rating			
3	Exposures with Lowest Investment Grade Long-Term Credit Rating or Third-Highest Investment Grade Short-Term Credit Rating			
4	Exposures with Long-Term Credit Rating One Category Below Investment Grade			
5	Total RBA and IAA Securitization Exposures and RWA			

Securitization - Schedule T - Detail Schedule

	Memorandum Items	A Exposure Amount	B RWA	C Deduction
1	Unrated exposures requiring deduction because no IRB treatment for the underlying exposures			
2	Exposures requiring deduction under the SFA			
3	Exposures not requiring deduction under the SFA			
4	Total exposures to synthetic securitizations			
5	eligible credit derivatives from eligible securitization guarantors			
6	Total RWA for securitization exposures if not capped under section 42(d) of NPR			
7	RWA for Early Amortization Provisions, Retail Credit Lines			
8	RWA for Early Amortization Provisions, Non-Retail Credit Lines			

Equity Exposures - Schedule U

		A		B
		Exposure ($)	Risk Weight or Multiplier	RWA ($)
1	Total Equity Exposures			
	Excluded Exposures:			
2	0% Risk Weight Equity Exposures		0%	
3	FHLB/Farmer Mac Exposures - 20%		20%	
4	FHLB/Farmer Mac Exposures - 100%		100%	
5	Community Development Equity Exposures		100%	
6	Equity Exposures to Investment Funds			
6a	Full look-through approach			
6b	Simple modified look-through approach			
6c	Alternative modified look-through approach			
	Simple Risk Weight Approach (SRWA)			
7	Excluded Equity Exposures to Investment Funds			
8	Aggregate equity exposures in hedge pairs with smaller adjusted carrying value			
9	Effective Portion of Hedge Pairs		100%	
10	Non-significant equity exposures		100%	
11	Publicly traded equity exposures		300%	
12	Non-publicly traded equity exposures		400%	
13	Total RWA - SWRA			
	Full Internal Models Approach (Full IMA)			
14	Estimate of Potential Losses on Equity Exposures		12.5	
	Floors (Full IMA):			
15	Publicly Traded		200%	
16	Non-Publicly Traded		300%	
17	RWA - Floors			
18	Total RWA - Full IMA			
	Publicly-Traded Internal Models Approach (Partial IMA)			
19	Estimate of Potential Losses on Publicly-Traded Equity Exposures		12.5	
	Floors (Partial IMA):			
20	Publicly Traded		200%	
21	Non-Publicly Traded Equity Exposures		400%	
22	Total RWA -- Partial IMA			

Operational Risk - Schedule V

			A	Format
	PUBLIC			
	Operational Risk Capital			
1	Risk-based Capital Requirement for Operational Risk			Num
2	Is item 1 generated from an "alternative operational risk quantification system?"	y/n		Text
	Expected Operational Loss (EOL) and Eligible Operational Risk Offsets			
3	Expected Operational Loss (EOL)			Num
4	Total Eligible Operational Risk Offsets			
4a	Eligible GAAP reserves			Num
4b	Other eligible offsets			Num
	Total Risk-based Capital Requirement for Operational Risk without:			
5	Dependence assumptions			Num
6	Adjustments reflecting business environment and internal control factors			Num
7	Risk mitigants (e.g., insurance)			Num
	CONFIDENTIAL			
	Internal Operational Loss Data Characteristics			
8	Reporting dates			
8a	Starting date			Num
8b	Ending date			Num
9	Highest dollar threshold on loss data			Num
10	Does the dollar threshold change across units of measure?	y/n		Text

		A Used in Modeling Op Risk Capital	B Total for Current Reporting Period	Format
11	Total number of losses			Num
12	Total dollar amount of losses			Num
13	Dollar amount of largest loss			Num
14	Number of losses in the following ranges (e.g., ≥ $10,000 and < $100,000):			
14a	$10,000 - $100,000			Num
14b	$100,000 - $1 Million			Num
14c	$1 Million - $10 Million			Num
14d	$10 Million - $100 Million			Num
14e	$100 Million - $1 Billion			Num
14f	$1 Billion+			Num
15	Total dollar amount of losses in the following ranges (e.g., ≥ $10,000 and < $100,000):			
15a	$10,000 - $100,000			Num
15b	$100,000 - $1 Million			Num
15c	$1 Million - $10 Million			Num
15d	$10 Million - $100 Million			Num
15e	$100 Million - $1 Billion			Num
15f	$1 Billion+			Num
	Scenario Analysis			
16	How many individual scenarios were used in calculating the risk-based capital requirement for operational risk?			Num
17	What is the dollar value of the largest individual scenario?			Num
18	Number of scenarios in the following ranges (e.g., ≥ $1 Million and < $10 Million):			
18a	$1 Million - $10 Million			Num
18b	$10 Million - $100 Million			Num
18c	$100 Million - $500 Million			Num
18d	$500 Million - $1 Billion			Num
18e	$1 Billion+			Num
	Distributional Assumptions			
19	How many units of measure were used in calculating the risk-based capital requirement for operational risk?			Num
20	**Frequency Distribution**: Across how many individual units of measure did the choice of frequency distribution change since the last reporting period?			Num
21	**Severity Distribution**: Across how many individual units of measure did the choice of severity distribution change since the last reporting period?			Num
	Loss Caps			
22	How many loss caps are used in calculating the risk-based capital requirement for operational risk?			Num
23	What is the dollar amount of the smallest cap used?			Num
24	What is the dollar amount of the largest cap used?			Num

Reporting Instructions for Schedules A through V

Schedule A - ADVANCED RISK-BASED CAPITAL (Calculation of Numerator and Ratios for banks and bank holding companies)

Item Instructions
Item No. Caption and Instructions

Tier 1 Capital

1. Total equity capital. Report the amount of the bank's total equity capital as reported in Schedule RC, item 28, of the Call Report.

2. LESS: Net unrealized gains (losses) on available-for-sale securities. Report the amount of net unrealized holding gains (losses) on available-for-sale securities that is included in Schedule RC of the Call Report, item 26.b, "Accumulated other comprehensive income." If the amount is a net unrealized holding gain, report it as a positive value in this item. If the amount is a net unrealized holding loss, report it as a negative value in this item.

3. LESS: Net unrealized loss on available-for-sale equity securities. Report as a positive value the amount of any net unrealized holding loss on available-for-sale equity securities that is included in Schedule RC of the Call Report, item 26.b, "Accumulated other comprehensive income."

4. LESS: Accumulated net gains (losses) on cash flow hedges. Report the amount of accumulated net gains (losses) on cash flow hedges that is included in Schedule RC of the Call Report, item 26.b, "Accumulated other comprehensive income." If the amount is an accumulated net gain, report it as a positive value in this item. If the amount is an accumulated net loss, report it as a negative value in this item.

5. LESS: Nonqualifying perpetual preferred stock. Report the portion of perpetual preferred stock (and any related surplus) included in the Call Report, item 23, that **does not** qualify for inclusion in Tier 1 capital based on the capital guidelines of the bank's primary Federal supervisor. Generally, banks should include in this item the book value of all perpetual preferred stock except for noncumulative perpetual preferred stock. However, noncumulative perpetual preferred stock in which the dividend rate is periodically reset based on the bank's credit standing or financial condition e.g., Dutch auction, money market, and remarketable preferred stock, is not eligible for Tier 1 capital and should be included in this item. Although the amount reported in this item is not eligible for Tier 1 capital, it may be eligible for inclusion in Tier 2 capital in item 13.

6. Qualifying minority interests in consolidated subsidiaries. Report the portion of minority interests in consolidated subsidiaries included in Schedule RC of the Call Report, item 22, that is eligible for inclusion in Tier 1 capital based on the capital guidelines of the bank's primary Federal supervisor. Generally, banks may include minority interests in equity capital accounts (both common and noncumulative perpetual preferred stocks) of consolidated subsidiaries unless such accounts would not otherwise qualify for inclusion in Tier 1 capital. For example, a bank may not include minority interests representing cumulative preferred stock in consolidated subsidiaries since such preferred stock if issued directly by the bank would not be eligible for inclusion in Tier 1 capital.

[Note: Placeholder for BHC instructions: Qualifying trust preferred securities.

7. LESS: Disallowed goodwill and other disallowed intangible assets. Report the portion of goodwill included in Schedule RC of the Call Report, item 10.a, and the portion of other identifiable intangible assets included in Schedule RC-M of the Call Report, item 2.c, that does not qualify for inclusion in Tier 1 capital based on the capital guidelines of the bank's primary Federal supervisor. Generally, all goodwill reported in item 10.a, and all other identifiable intangible assets reported in Schedule RC-M of the Call Report, item 2.c, do not qualify for Tier 1 capital and should be included in this item.

However, if the bank has a deferred tax liability that is specifically related to an intangible asset (other than servicing assets and purchased credit card relationships) acquired in a nontaxable purchase business combination that it chooses to net against the intangible asset for regulatory capital purposes, the amount of disallowed intangibles to be reported in this item should be reduced by the amount of this deferred tax liability. However, a deferred tax liability that the bank chooses to net against the related intangible asset for purposes of this item may not also be netted against deferred tax assets when the bank determines the amount of deferred tax assets that are dependent upon future taxable income and calculates the maximum allowable amount of such deferred tax assets for regulatory capital purposes.

For state member banks, if the amount reported for other identifiable intangible assets in Schedule RC-M of the Call Report, item 2.c, includes intangible assets that were recorded on the reporting bank's balance sheet on or before February 19, 1992, the remaining book value as of the report date of these intangible assets may be excluded from this item.

8. Subtotal. Report the sum of items 1 and 6, less items 2, 3, 4, 5, and 7. The amount reported in this item should be used to determine the limitations on servicing assets and purchased credit card relationships for item 9.a; deferred tax assets, item 9.b, below.

9a. LESS: Disallowed servicing assets and purchased credit card relationships. Report the portion of servicing assets and purchased credit card relationships included in Schedule RC-M of the Call Report, items 2.a and 2.b, that **does not** qualify for inclusion in Tier 1 capital based on the capital guidelines of the bank's primary Federal supervisor. Generally, servicing assets and purchased credit card relationships (PCCRs) are limited to 100 percent of Tier 1 capital. In addition, nonmortgage servicing assets and PCCRs are subject to a separate sublimit of 25 percent of Tier 1 capital. Banks may use the following approach to determine the amount of disallowed servicing assets and PCCRs.

Disallowed Mortgage Servicing Assets, Nonmortgage Servicing Assets, and PCCRs Calculation

(a) Enter the amount from item 8 ________

(b) Enter 25% of the amount in (a) above ________

(c) Enter the amount of nonmortgage servicing assets and PCCRs reported in Schedule RC-M of the Call Report, item 2.b ________

(d) Enter 90% of the fair value of the nonmortgage servicing assets and PCCRs reported in (c) above ________

(e) Enter the lesser of (b), (c), or (d) ________

(f) Minimum amount of nonmortgage servicing assets and PCCRs to be deducted from Tier 1 capital: subtract (e) from (c); enter 0 if the result is a negative amount ________

(g) Enter the amount of mortgage servicing assets
reported in Schedule RC-M of the Call Report, item 2.a ________

(h) Enter 90% of the estimated fair value of mortgage servicing
assets reported in Schedule RC-M of the Call Report, item 2.a.(1) ________

(i) Enter the lesser of (a), (g), or (h) ________

(j) Minimum amount of mortgage servicing assets to be
deducted from Tier 1 capital: subtract (i) from (g);
enter 0 if the result is a negative amount ________

(k) Excess nonmortgage servicing assets, PCCRs, and
mortgage servicing assets (i.e., the combined amount
exceeding 100% of Tier 1 capital): sum of (e) and (i)
minus (a); enter 0 if the result is a negative amount ________

(l) Disallowed nonmortgage servicing assets, PCCRs, and
mortgage servicing assets: enter the sum of
(f), (j), and (k) ________

9b. LESS: Disallowed deferred tax assets. Report the portion of net deferred tax assets included in Schedule RC-F of the Call Report, item 2, that **does not** qualify for inclusion in Tier 1 capital based on the capital guidelines of the reporting bank's primary Federal supervisor. Generally, deferred tax assets that are dependent upon future taxable income are limited to the lesser of: (i) the amount of such deferred tax assets that the bank expects to realize within one year of the calendar quarter-end date, based on its projected future taxable income for that year or (ii) 10% of the amount of the bank's Tier 1 capital. A bank may calculate one overall limit on deferred tax assets that covers all tax jurisdictions in which the bank operates.

Deferred tax assets that are dependent upon future taxable income are (a) deferred tax assets arising from deductible temporary differences that exceed the amount of taxes previously paid that a bank could recover through loss carrybacks if the bank's temporary differences (both deductible and taxable) fully reverse at the report date and (b) deferred tax assets arising from operating loss and tax credit carryforwards. Therefore, for purposes of this item, all temporary differences should be assumed to fully reverse at the report date.

A bank may use its future taxable income projection for its current fiscal year (adjusted for any significant changes that have occurred or are expected to occur) when determining the regulatory capital limit for its deferred tax assets at an interim calendar quarter-end date rather than preparing a new projection each quarter. Projected future taxable income should not include net operating loss carryforwards expected to be used within one year of the quarter-end report date or the amount of existing temporary differences expected to reverse within that year, but should include the estimated effect of tax planning strategies that are expected to be implemented to realize carryforwards that will otherwise expire during that year.

When determining the amount to be reported in this item, each reporting bank's calculations should be made on a separate entity basis. Under the separate entity method, a bank (together with its consolidated subsidiaries) that is a subsidiary of a holding company is treated as a separate taxpayer rather than as part of the consolidated group of which it is a member.

Deferred tax assets which can be realized from taxes paid in prior carryback years and from future reversals of existing taxable temporary differences should generally not be reported in this item. However, for a bank that is a subsidiary of a holding company, the parent holding company may not have the financial capability to reimburse the reporting bank for tax benefits derived from the bank's carryback of net operating losses or tax credits. In such a situation, when determining the amount of deferred tax assets that are dependent upon future taxable income, the amount of carryback potential the bank may consider as being available for the realization of its deferred tax assets shall be limited to the amount which the bank could reasonably expect to have refunded by its parent.

Treatment of deferred tax assets relating to available-for-sale securities -- In accordance with FASB Statement No. 115, *Accounting for Certain Investments in Debt and Equity Securities*, available-for-sale securities are reported in the Reports of Condition and Income at fair value, with unrealized holding gains and losses on such securities, net of tax effects, included in a separate component of equity capital. These tax effects may increase or decrease the reported amount of a bank's deferred tax assets. The federal banking agencies exclude from regulatory capital the amount of net unrealized holding gains and losses on available-for-sale securities (except net unrealized holding losses on available-for-sale equity securities with readily determinable fair values). When determining the regulatory capital limit for deferred tax assets, a bank may, but is not required to, adjust the amount of its deferred tax assets for any deferred tax assets and liabilities arising from marking-to-market available-for-sale debt securities for purposes of these reports. A bank must follow a consistent approach with respect to such adjustments.

Banks may use the following approach to determine the amount of disallowed deferred tax assets.

Disallowed Deferred Tax Assets Calculation
(a) Enter the amount from item 8 ________

(b) Enter 10% of the amount in (a) above ________

(c) Enter the amount of deferred tax assets reported in Schedule RC-F of the Call Report, item 2 ________

(d) Enter the amount of taxes previously paid that the bank could recover through loss carrybacks if the bank's temporary differences (both deductible and taxable) fully reverse at the report date ________

(e) Amount of deferred tax assets that is dependent upon future taxable income: subtract (d) from (c); enter 0 if the result is a negative amount ________

(f) Enter the portion of (e) that the bank could realize within the next 12 months based on its projected future taxable income. Future taxable income should not include net operating loss carryforwards to be used during the next 12 months or existing temporary differences that are expected to reverse over the next 12 months. ________

(g) Enter the lesser of (b) and (f) ________

(h) Disallowed net deferred tax assets - subtract (g) from (e); enter 0 if the result is a negative amount ________

9.c LESS: Shortfall of eligible credit reserves below total expected credit losses (50% of the shortfall plus tier 2 carryover)

Eligible credit reserves are defined as all general allowances, including the ALLL, that have been established through a charge against earnings to absorb credit losses associated with on- or off-balance sheet wholesale and retail exposures. Eligible credit reserves would not include allocated transfer risk reserves established pursuant to 12 U.S.C. 3904 and other specific reserves created against recognized losses.

A bank's total expected credit losses (ECL) is defined as the sum of the ECL for all wholesale and retail exposures other than exposures to which the bank has applied double default treatment. The bank's ECL for a wholesale exposure to a non-defaulted obligor or a non-defaulted retail segment is the product of PD, ELGD, and EAD for the exposure or segment. The bank's ECL for a wholesale exposure to a defaulted obligor or a defaulted retail segment is equal to the bank's impairment estimate for ALLL purposes for the exposure or segment.

A shortfall is created when the total dollar amount of ECL exceeds the bank's eligible credit reserves. If there is a shortfall of eligible credit reserves compared to ECL, the bank must deduct 50 percent of the shortfall from tier 1 capital and 50 percent from tier 2 capital. If the amount deductible from tier 2 capital exceeds the bank's actual tier 2 capital, the bank would deduct the excess from tier 1 capital (this is known as the "tier 2 carryover").

9d. LESS: Gain-on-sale associated with securitization exposures.

A bank must deduct from tier 1 capital any increase in the bank's equity capital at the inception of a securitization transaction (gain-on-sale), other than an increase in equity capital that results from the bank's receipt of cash in connection with the securitization. Under SFAS No. 140, an institution initially measures and records assets retained in connection with a sale or securitization, based on relative fair values. That is, the institution allocates the previous carrying amount between the sold assets and the retained interests based on their relative fair values. The reported gain is the difference between the net proceeds from the sale and the allocated carrying value of the assets sold. This methodology is often called "gain-on-sale" accounting. For example, a bank would deduct a gain attributable to a credit-enhancing interest-only strip (CEIO) that results from FAS 140 accounting treatment for the sale of underlying exposures to a securitization special purpose entity (SPE) Under the proposed rule, a bank must deduct such interests from tier 1 to the extent they represent gain-on-sale. For CEIOs, a bank must deduct CEIOs, from tier 1 capital to the extent they represent gain-on-sale, and must deduct any remaining CEIOs 50 percent from tier 1 capital and 50 percent from tier 2 capital. Any remaining Tier 1 deductions for CEIOs (that does not represent gain-on-sale) should be reported in item 9(f) below, and any remaining Tier 2 deductions should be reported in item 17(c) below.

9e. LESS Certain failed capital markets transactions (50% of deductions plus tier 2 carryover).

Deduct in this item 50% of its exposure on certain unsettled and failed transactions (50 percent from tier 1 and 50 percent from tier 2). These transactions include non-delivery-versus-payment (non-DvP) and non-payment-versus-payment (non-PvP) transactions (with a normal settlement period) where the bank has not received the deliverables by the fifth business day after counterparty delivery was due. In these instances, the bank must deduct the current market value of the deliverables owed to the bank 50 percent from tier 1 and 50 percent from tier 2.
If the amount deductible from tier 2 capital exceeds the bank's actual tier 2 capital, the bank would deduct the excess from tier 1 capital.

9f. LESS: Other securitization deductions (50% of deductions plus tier 2 carryover)

Certain other securitization exposures also would be deducted from tier 1 and tier 2 capital. These exposures include, for example, securitization exposures that have an applicable external rating that is more than one category below investment grade (for example, below BB) and most subordinated unrated

securitization exposures. When a bank must deduct a securitization exposure (other than gain-on-sale) from regulatory capital, the bank must take the deduction 50 percent from tier 1 capital and 50 percent from tier 2 capital. Report in this item any remaining Tier 1 deductions for CEIOs (that do not represent gain-on-sale).
If the amount deductible from tier 2 capital exceeds the bank's actual tier 2 capital, the bank would deduct the excess from tier 1 capital..
A bank may calculate any deductions from regulatory capital with respect to a securitization exposure (including after-tax gain-on-sale) net of any deferred tax liabilities associated with the exposure.

10. Other additions to (deductions from) Tier 1 capital. Report the amount of any additions to or deductions from Tier 1 capital based on the capital guidelines of the reporting bank's primary Federal supervisor that are not included in items 1 through 9.f, above. If the amount to be reported in this item is a net deduction, enclose the amount in parentheses.

[**NOTE: <u>Placeholder for BHC instructions</u>**: The BHC must deduct from tier 1 capital an amount equal to the insurance underwriting subsidiary's minimum regulatory capital requirement as determined by its functional (or equivalent) regulator. For U.S. regulated insurance subsidiaries, this amount would be 200 percent of the subsidiary's Authorized Control Level as established by the appropriate state insurance regulator.]

Banks with financial subsidiaries should exclude from this item adjustments to Tier 1 capital for the deconsolidation of such subsidiaries. Adjustments to Tier 1 capital for financial subsidiaries should be reported in item 29.a, below.

11. Tier 1 capital. Report the sum of items 8 and 10, less items 9.a through 9.f. If the bank has no financial subsidiaries, the amount reported in this item is the numerator of the bank's Tier 1 risk-based capital ratio and its Tier 1 leverage ratio.

Tier 2 Capital

12. Qualifying subordinated debt and redeemable preferred stock. Report the portion of the bank's qualifying limited-life capital instruments that is includible in Tier 2 capital based on the capital guidelines of the reporting bank's primary Federal supervisor. This amount is the sum of:

(1) the portion of qualifying subordinated debt and intermediate-term preferred stock includible in Tier 2 capital, and

(2) the portion of qualifying other limited-life capital instruments includible in Tier 2 capital.

The portion of limited-life capital instruments that is includible in Tier 2 capital is the amount that remains after discounting those instruments, if any, with five years or less until maturity and then applying any applicable percentage of Tier 1 capital limit. For limited-life capital instruments with serial maturities or with sinking fund provisions, the amount associated with each maturity date is to be treated as a separate issue and discounted on an individual basis. If the holder of the reporting bank's subordinated debt or intermediate-term or long-term preferred stock has the right to require the bank to redeem, repay, or repurchase the instrument prior to the original stated maturity, then maturity would be defined as the earliest possible date on which the holder can put the instrument back to the issuing bank. Qualifying term subordinated debt and intermediate-term preferred stock (including any related surplus) must have an original weighted average maturity of at least five years. Intermediate-term preferred stock includes those issues of preferred stock with an original maturity of less than 20 years. Mandatory convertible debt, i.e., equity contract notes, is not considered a limited-life capital instrument for risk-based capital purposes and should be excluded from this item.

The portion of qualifying term subordinated debt and intermediate-term preferred stock that remains after discounting and is includible in Tier 2 capital is limited to 50 percent of Tier 1 capital. This portion is calculated as follows:

(A1) Amount of subordinated debt and intermediate-term preferred stock with a remaining maturity of more than five years ______x 100% =______

(A2) Amount of subordinated debt and intermediate-term preferred stock with a remaining maturity of more than four years, but less than five years ______x 80% =______

(A3) Amount of subordinated debt and intermediate-term preferred stock with a remaining maturity of more than three years, but less than four years ______x 60% =______

(A4) Amount of subordinated debt and intermediate-term preferred stock with a remaining maturity of more than two years, but less than three years ______x 40% =______

(A5) Amount of subordinated debt and intermediate-term preferred stock with a remaining maturity of more than one year, but less than two years ______x 20% =_____

(A6) Amount of subordinated debt and intermediate-term (cont.) preferred stock with a remaining maturity of one year or less ______x 0% =______

(A7) Qualifying subordinated debt and intermediate-term preferred stock (sum of discounted amounts of lines (A1) through (A6)) ______

(A8) Tier 1 capital (from item 11) ______

(A9) Multiplied by 50 percent x 50%

(A10) Limit for qualifying subordinated debt and intermediate-term preferred stock (line (A8) multiplied by 50 percent) ______

(A11) Portion of qualifying subordinated debt and intermediate-term preferred stock includible in Tier 2 capital (lesser of lines (A7) and (A10)) ______

The entire amount of qualifying other limited-life capital instruments, such as long-term preferred stock with an original maturity of 20 years or more, that remains after discounting is includible in Tier 2 capital. This portion is calculated as follows:

(B1) Amount of other limited-life capital instruments with a remaining maturity of more than five years ______x 100% =______

(B2) Amount of other limited-life capital instruments with a remaining maturity of more than four years, but less than five years ______x 80% =______

(B3) Amount of other limited-life capital instruments with a remaining maturity of more than three years, but less than four years ______x 60% =______

(B4) Amount of other limited-life capital instruments with a remaining maturity of more than two year, but less than three years ______x 40% =______

(B5) Amount of other limited-life capital instruments with a remaining maturity of more than one year, but less than two years ______x 20% =______

(B6) Amount of other limited-life capital instruments with a remaining maturity of one year or less ______x 0% =______

(B7) Portion of qualifying other limited-life capital instruments (sum of discounted amounts of lines (B1) through (B6)) **______**

Report the sum of the amounts from lines (A11) and (B7) above in item 12.

13. Qualifying cumulative perpetual preferred stock includible in Tier 2 capital. Report the amount of qualifying outstanding cumulative perpetual preferred stock, including any amounts received in excess of its par or stated value, that is included in Schedule RC of the Call Report, item 23. Also include perpetual preferred stock issues that were excluded from Tier 1 capital such as noncumulative perpetual preferred where the dividend is reset periodically based, in whole or in part, upon the bank's current credit standing (including, but not limited to, auction rate, money market, and remarketable preferred stock).

14. Excess of eligible credit reserves over total expected credit losses (up to .60% of credit risk-weighted assets). If eligible credit reserves exceed total ECL, the excess portion of eligible credit reserves may be included in tier 2 capital up to 0.6 percent of credit-risk-weighted assets. Credit-risk-weighted assets is defined as 1.06 multiplied by the sum of total wholesale and retail risk-weighted assets, risk-weighted assets for securitization exposures, and risk-weighted assets for equity exposures.

15. Unrealized gains on available-for-sale equity securities includible in Tier 2 capital.
Report the pretax net unrealized holding gain (i.e., the excess of fair value as reported in Schedule RC-B of the Call Report, item 7, column D, over historical cost as reported in Schedule RC-B of the Call Report, item 7, column C), if any, on available-for-sale equity securities that is includible in Tier 2 capital subject to the limits specified by the capital guidelines of the reporting bank's primary Federal supervisor. The amount reported in this item cannot exceed 45 percent of the bank's pretax net unrealized holding gain on available-for-sale equity securities with readily determinable fair values.

16. Other additions to (deductions from) Tier 2 capital. Report the amount of any items that qualify for inclusion in Tier 2 capital based on the capital guidelines of the reporting bank's primary Federal supervisor that are not included in items 12 through 15, above. Include mandatory convertible debt, i.e., equity contract notes, which is a form of subordinated debt that obligates the holder to take the common or perpetual preferred stock of the issuer in lieu of cash for repayment of principal.

The bank should also report as a deduction in this item 50% of its exposure to certain unsettled and failed transactions (50% from tier 1 and 50% from tier 2). These transactions include non-delivery-versus-payment (non-DvP) and non-payment-versus-payment (non-PvP) transactions (with a normal settlement period) where the bank has not received the deliverables by the fifth business day after counterparty delivery was due. In these instances, the bank must deduct the current market value of the deliverables owed to the bank 50 percent from tier 1 and 50 percent from tier 2.

17. Adjustments to Tier 2 capital.

17a. LESS: Shortfall of eligible credit reserves below total expected credit losses (up to the lower of 50% of the shortfall or amount of tier 2 capital).

A bank’s total ECL is defined as the sum of the ECL for all wholesale and retail exposures other than exposures to which the bank has applied double default treatment. The bank’s ECL for a wholesale exposure to a non-defaulted obligor or a non-defaulted retail segment is the product of PD, ELGD, and EAD for the exposure or segment. The bank’s ECL for a wholesale exposure to a defaulted obligor or a defaulted retail segment is equal to the bank’s impairment estimate for ALLL purposes for the exposure or segment.

A shortfall is created when the total dollar amount of ECL exceeds the bank’s eligible credit reserves. If there is a shortfall of eligible credit reserves compared to ECL, the bank must deduct 50 percent of the shortfall from tier 1 capital and 50 percent from tier 2 capital. If the amount deductible from tier 2 capital exceeds the bank's actual tier 2 capital, the bank would deduct the excess from tier 1 capital..

17b. LESS: Certain failed capital markets transactions (up to the lower of 50% of the shortfall or amount of tier 2 capital).

Deduct in this item 50% of its exposure on certain unsettled and failed transactions (50 percent from tier 1 and 50 percent from tier 2). These transactions include non-delivery-versus-payment (non-DvP) and non-payment-versus-payment (non-PvP) transactions (with a normal settlement period) where the bank has not received the deliverables by the fifth business day after counterparty delivery was due. In these instances, the bank must deduct the current market value of the deliverables owed to the bank 50 percent from tier 1 and 50 percent from tier 2.
If the amount deductible from tier 2 capital exceeds the bank's actual tier 2 capital, the bank would deduct the excess from tier 1 capital.

17c. LESS: Other securitization deductions (up to the lower of 50% of shortfall or amount of tier 2 capital).

Certain other securitization exposures also would be deducted from tier 1 and tier 2 capital. These exposures include, for example, securitization exposures that have an applicable external rating that is more than one category below investment grade (for example, below BB) and most subordinated unrated securitization exposures. When a bank must deduct a securitization exposure (other than gain-on-sale) from regulatory capital, the bank must take the deduction 50 percent from tier 1 capital and 50 percent from tier 2 capital. Report in this item any remaining Tier 2 deductions for CEIOs (that do not represent gain-on-sale) If the amount deductible from tier 2 capital exceeds the bank's actual tier 2 capital, the bank would deduct the excess from tier 1 capital.

18. Tier 2 capital. Report the sum of items 12 through 16, less items 17.a through 17.c.

19. Allowable Tier 2 capital. Report the amount of the bank's allowable Tier 2 capital. The maximum amount of Tier 2 capital that is allowable in a bank's qualifying total capital is 100 percent of Tier 1 capital. The amount reported in this item must be the lesser of item 11, "Tier 1 capital," and item 18, "Tier 2 capital," if item 11 is a positive number. If item 11, is a negative number, report a zero in this item.

20. Tier 3 capital allocated for market risk. Report the amount of the bank's Tier 3 capital allocated for market risk. This item is only applicable to banks that are subject to the market risk capital guidelines. The amount reported in this item may only be used to satisfy the bank's market risk capital requirement and may not be used to support credit risk. The sum of the amount reported in this item and the amount reported in item 19, "Allowable Tier 2 capital," must be less than or equal to the amount reported in item 11, "Tier 1 capital." In addition, Tier 3 capital allocated for market risk plus Tier 2 capital allocated for market risk are limited to 71.4 percent of a bank's measure for market risk.

21. LESS: Deductions for total risk-based capital. Report the amount of the bank's investments in banking and finance subsidiaries that are not consolidated for regulatory capital purposes, intentional reciprocal cross-holdings of banking organizations' capital instruments, and any other deductions for total risk-based capital as determined by the reporting bank's primary Federal supervisor. Banks with financial subsidiaries should exclude adjustments to total risk-based capital for the deconsolidation of such subsidiaries. Adjustments to total risk-based capital for financial subsidiaries should be reported in item 29.b, below.

22. Total risk-based capital. Report the sum of items 11, 19, and 20, less item 21. The amount reported in this item is the numerator of the bank's total risk-based capital ratio.

Total assets for leverage ratio

23. Average total assets. Report the bank's average total assets as reported in Schedule RC-K of the Call Report, item 9.

24. LESS: Disallowed goodwill and other disallowed intangible assets. Report the amount of any disallowed goodwill and other disallowed intangible assets from item 7, above.

25. LESS: Disallowed servicing assets and purchased credit card relationships. Report the amount of any disallowed servicing assets and purchased credit card relationships from item 9.a, above.

26. LESS: Disallowed deferred tax assets. Report the amount of any disallowed deferred tax assets from item 9.b, above.

27. LESS: Other deductions from assets for leverage capital purposes. Report the amount of any other assets that are deducted in determining Tier 1 capital in accordance with the capital standards issued by the reporting bank's primary federal supervisory authority. Also include the adjusted carrying value of any nonfinancial equity investments for which a Tier 1 capital deduction is included on item 10, above.

Banks with financial subsidiaries should exclude from this item adjustments to average total assets for the deconsolidation of such subsidiaries. Adjustments to average total assets for financial subsidiaries should be reported in item 31, below.

28. Average total assets for leverage capital purposes. Report item 23, less items 24 through 27.

Adjustments for financial subsidiaries

NOTE: Items 29.a through 31, and column A of items 32 through 34 are only to be completed by banks with "financial subsidiaries" as defined by the Gramm-Leach-Bliley Act of 1999 (the Act). The Act effectively amends the federal banking agencies' capital guidelines to require all banks with financial subsidiaries to deconsolidate the assets and liabilities of all financial subsidiaries and to deduct the aggregate outstanding equity investment in the financial subsidiaries from capital and assets for purposes of calculating the bank's regulatory capital ratios.

29a. Adjustment to Tier 1 capital reported in item 11. Report one half of the bank's aggregate outstanding equity investment in financial subsidiaries as of the report date, which should be determined in the following manner.

If a financial subsidiary is not consolidated into the bank for purposes of these reports, one half of the bank's aggregate outstanding equity investment in the subsidiary is one half of the amount of the bank's ownership interest accounted for under the equity method of accounting. The bank's ownership interest will have been included in Schedule RC of the Call Report, item 8, "Investments in unconsolidated subsidiaries and associated companies." However, the bank's ownership interest in a financial subsidiary should exclude any loans and advances to the subsidiary and any holdings of the subsidiary's bonds, notes, and debentures, which are included in Schedule RC of the Call Report, item 8.

If one or more financial subsidiaries are consolidated into the bank for purposes of these reports, the bank may use the following approach to determine one half of the bank's aggregate outstanding equity investment in these consolidated financial subsidiaries.

One Half of the Aggregate Outstanding Equity Investments in Consolidated Financial Subsidiaries

(a) Enter the total assets of consolidated financial subsidiaries included in Schedule RC of the Call Report, item 12 ____________

(b) Enter the total liabilities of consolidated financial subsidiaries included in Schedule RC of the Call Report item 21 ____________

(c) Enter the sum of the amounts included in items 2, 3, 4, 5, 7, 9.a, and 9.b, above that are attributable to the bank's consolidated financial subsidiaries (e.g., goodwill on a financial subsidiary's balance sheet that was included in the disallowed goodwill reported on
item 7 above) ____________

(d) Enter the amount of "Other additions to (deductions from) Tier 1 capital" included in Schedule item 10 above, that is attributable to the bank's consolidated financial subsidiaries ____________

(e) Enter the amount of any minority interests in consolidated financial subsidiaries included in Schedule RC of the Call Report, item 22 ____________

(f) Enter the sum of (a) and (d) less (b), (c), and (e); enter 0 if the amount is a negative number

____

(g) Adjustment to Tier 1 capital reported in item 11 above (one half of the bank's aggregate outstanding equity investment for the bank's consolidated financial subsidiaries): enter 50% of the amount in (f) above

____

29b. Adjustment to total risk-based capital reported in item 22. Report the bank's aggregate outstanding equity investment in financial subsidiaries as of the report date, which should be determined in the following manner.

If a financial subsidiary is not consolidated into the bank for purposes of these reports, the bank's aggregate outstanding equity investment in the subsidiary is the amount of the bank's ownership interest accounted for under the equity method of accounting. The bank's ownership interest will have been included in Schedule RC of the Call Report, item 8, "Investments in unconsolidated subsidiaries and associated companies." However, the bank's ownership interest in a financial subsidiary should exclude any loans and advances to the subsidiary and any holdings of the subsidiary's bonds, notes, and debentures, which are included in Schedule RC of the Call Report, item 8.

If one or more financial subsidiaries are consolidated into the bank for purposes of these reports, the bank may use the following approach to determine the aggregate outstanding equity investments in these consolidated financial subsidiaries.

Aggregate Outstanding Equity Investments in Consolidated Financial Subsidiaries

(a) Enter the amount from line (f) in the calculation of the adjustment to Tier 1 capital for consolidated financial subsidiaries in the instructions for item 28.a, above ____________

(b) Enter the sum of the amounts included in items 12, 13, 14, 15, 16, and 20 above that are attributable to the bank's consolidated financial subsidiaries ____________

(c) Enter the amount of "Deductions for total risk-based capital" included in item 21 above, that is attributable to the bank's consolidated financial subsidiaries ____________

(d) Adjustment to total risk-based capital reported in item 22 above, for the bank's consolidated financial subsidiaries: enter the sum of (a) and (b) less (c) _____________

30. Adjustment to risk-weighted assets. Report the amount of the adjustment to risk-weighted assets for financial subsidiaries, which should be determined in the following manner.

If a financial subsidiary is not consolidated into the bank, the adjustment to risk-weighted assets for the subsidiary will equal the bank's ownership interest accounted for under the equity method of accounting that is included in total risk-weighted assets.

If a financial subsidiary is consolidated into the bank, the adjustment to risk-weighted assets for the subsidiary will be the total amount of the subsidiary's individual assets, derivatives, and off-balance sheet items as they have been allocated by risk weight across the risk weight categories, less the risk-weighted amount of bank assets representing claims on the financial subsidiary, other than the bank's ownership interest in the subsidiary, that were eliminated in consolidation. These eliminated assets will not have been included in the amounts reported.

31. Adjustment to average total assets reported in item 28 above. Report the amount of the adjustment to average total assets for financial subsidiaries, which should be determined in the following manner.

If a financial subsidiary is not consolidated into the bank, the adjustment to average total assets for the subsidiary will be the quarterly average of the bank's ownership interest accounted for under the equity method of accounting that is included in item 28 above.

If a financial subsidiary is consolidated into the bank, the adjustment to average total assets for the subsidiary will be the quarterly average of the assets of the subsidiary that have been included in the consolidated assets of the bank, as reported in Schedule item 23 above; less any disallowed intangible assets and deferred tax assets of the subsidiary that have been included in items 24, 25, and 26 above; less any other assets of the subsidiary that have been included as other deductions in item 27 above; and less the quarterly average of bank assets representing claims on the financial subsidiary, other than the bank’s ownership interest in the subsidiary, that were eliminated in consolidation. These eliminated assets will not have been included in the amount reported in item 23 above.

Capital Ratios

32. Tier 1 leverage ratio. Report the bank’s Tier 1 leverage ratio as a percentage, rounded to two decimal places. Column B is to be completed by all banks. The ratio for column B is determined by dividing item 11, by item 28. Banks with financial subsidiaries must also complete column A. The ratio for column A is determined as follows:

$$\frac{\text{Item 11, minus item 29.a}}{\text{Item 28, minus item 31}}$$

33. Tier 1 risk-based capital ratio. Report the bank’s Tier 1 risk-based capital ratio as a percentage, rounded to two decimal places. Column B is to be completed by all banks. The ratio for column B is determined by dividing item 11, by total risk-weighted assets. Banks with financial subsidiaries must also complete column A. The ratio for column A is determined as follows:

$$\frac{\text{Item 11, minus item 29.a}}{\text{Schedule B, item 31, minus item 30 of Schedule A}}$$

34. Total risk-based capital ratio. Report the bank’s total risk-based capital ratio as a percentage, rounded to two decimal places. Column B is to be completed by all banks. The ratio for column B is determined by dividing item 22, by total risk-weighted assets. For banks with financial subsidiaries must also complete column A. The ratio for column A is determined as follows:

Item 22, minus item 29.b
Schedule B, item 31, minus item 30 of Schedule A

35. Eligible credit reserves.

Report the amount of the bank's eligible credit reserves. Eligible credit reserves are defined as all general allowances, including the ALLL, that have been established through a charge against earnings to absorb credit losses associated with on- or off-balance sheet wholesale and retail exposures. Eligible credit reserves would not include allocated transfer risk reserves established pursuant to 12 U.S.C. 3904 and other specific reserves created against recognized losses.

36. Total expected credit losses.

Report the amount of the bank's total ECL. A bank's ECL are defined as the sum of the ECL for all wholesale and retail exposures other than exposures to which the bank has applied double default treatment. The bank's ECL for a wholesale exposure to a non-defaulted obligor or a non-defaulted retail segment is the product of PD, ELGD, and EAD for the exposure or segment. The bank's ECL for a wholesale exposure to a defaulted obligor or a defaulted retail segment is equal to the bank's impairment estimate for ALLL purposes for the exposure or segment.

Schedule B PREPARATION INSTRUCTIONS		
Report the information required for Table B using the definitions provided in the NPR. Round all numbers to the nearest thousand and percentages to two decimal places.		
Column	Row(s)	Instructions
A	1	Report the weighted average probability of default before consideration of credit risk mitigation from cell A-13 of the Wholesale Exposure – Corporate schedule.
B	1	Report the total balance sheet amount from cell C-13 of the Wholesale Exposure – Corporate schedule.
C	1	Report the total dollar volume of undrawn exposures from cell D-13 of the Wholesale Exposure – Corporate schedule.
D	1	Report the total dollar volume of exposure at default from cell E-13 of the Wholesale Exposure – Corporate schedule.
E	1	Report the weighted average maturity from cell F-13 of the Wholesale Exposure – Corporate schedule.
F	1	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-13 of the Wholesale Exposures – Corporate schedule.
G	1	Report the total amount of risk weighted assets from cell I-13 of the Wholesale Exposure – Corporate schedule.
H	1	Report the total dollar volume of expected credit loss from cell J-13 of the Wholesale Exposure – Corporate schedule.
A	2	Report the weighted average probability of default before consideration of credit risk mitigation from cell A-13 of the Wholesale Exposure – Bank schedule.
B	2	Report the total balance sheet amount from cell C-13 of the Wholesale Exposure – Bank schedule.
C	2	Report the total dollar volume of undrawn exposures from cell D-13 of the Wholesale Exposure – Bank schedule.
D	2	Report the total dollar volume of exposure at default from cell E-13 of the Wholesale Exposure – Bank schedule.
E	2	Report the weighted average maturity from cell F-13 of the Wholesale Exposure – Bank schedule.
F	2	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-13 of the Wholesale Exposures – Bank schedule.
G	2	Report the total amount of risk weighted assets from cell I-13 of the Wholesale Exposure – Bank schedule.
H	2	Report the total dollar volume of expected credit loss from cell J-13 of the Wholesale Exposure – Bank schedule.
A	3	Report the weighted average probability of default before consideration of credit risk mitigation from cell A-13 of the Wholesale Exposure – Sovereign schedule.
B	3	Report the total balance sheet amount from cell C-13 of the Wholesale Exposure – Sovereign schedule.
C	3	Report the total dollar volume of undrawn exposures from cell D-13 of the Wholesale Exposure – Sovereign schedule.

Schedule B PREPARATION INSTRUCTIONS		
D	3	Report the total dollar volume of exposure at default from cell E-13 of the Wholesale Exposure – Sovereign schedule.
E	3	Report the weighted average maturity from cell F-13 of the Wholesale Exposure – Sovereign schedule.
F	3	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-13 of the Wholesale Exposures – Sovereign schedule.
G	3	Report the total amount of risk weighted assets from cell I-13 of the Wholesale Exposure – Sovereign schedule.
H	3	Report the total dollar volume of expected credit loss from cell J-13 of the Wholesale Exposure – Sovereign schedule.
A	4	Report the weighted average probability of default before consideration of credit risk mitigation from cell A-13 of the Wholesale Exposure – Construction IPRE schedule.
B	4	Report the total balance sheet amount from cell C-13 of the Wholesale Exposure – Construction IPRE schedule.
C	4	Report the total dollar volume of undrawn exposures from cell D-13 of the Wholesale Exposure – Construction IPRE schedule.
D	4	Report the total dollar volume of exposure at default from cell E-13 of the Wholesale Exposure – Construction IPRE schedule.
E	4	Report the weighted average maturity from cell F-13 of the Wholesale Exposure – Construction IPRE schedule.
F	4	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-13 of the Wholesale Exposures – Construction IPRE schedule.
G	4	Report the total amount of risk weighted assets from cell I-13 of the Wholesale Exposure – Construction IPRE schedule.
H	4	Report the total dollar volume of expected credit loss from cell J-13 of the Wholesale Exposure – Construction IPRE schedule.
A	5	Report the weighted average probability of default before consideration of credit risk mitigation from cell A-13 of the Wholesale Exposure – HVCRE schedule.
B	5	Report the total balance sheet amount from cell C-13 of the Wholesale Exposure – HVCRE schedule.
C	5	Report the total dollar volume of undrawn exposures from cell D-13 of the Wholesale Exposure – HVCRE schedule.
D	5	Report the total dollar volume of exposure at default from cell E-13 of the Wholesale Exposure – HVCRE schedule.
E	5	Report the weighted average maturity from cell F-13 of the Wholesale Exposure – HVCRE schedule.
F	5	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-13 of the Wholesale Exposures – HVCRE schedule.
G	5	Report the total amount of risk weighted assets from cell I-13 of the Wholesale Exposure – HVCRE schedule.
H	5	Report the total dollar volume of expected credit loss from cell J-

Schedule B PREPARATION INSTRUCTIONS		
		13 of the Wholesale Exposure – HVCRE schedule.
A	6	Report the weighted average probability of default before consideration of credit risk mitigation from cell A-13 of the Wholesale Exposure – IPRE schedule.
B	6	Report the total balance sheet amount from cell C-13 of the Wholesale Exposure – IPRE schedule.
C	6	Report the total dollar volume of undrawn exposures from cell D-13 of the Wholesale Exposure – IPRE schedule.
D	6	Report the total dollar volume of exposure at default from cell E-13 of the Wholesale Exposure – IPRE schedule.
E	6	Report the weighted average maturity from cell F-13 of the Wholesale Exposure – IPRE schedule.
F	6	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-13 of the Wholesale Exposures – IPRE schedule.
G	6	Report the total amount of risk weighted assets from cell I-13 of the Wholesale Exposure – IPRE schedule.
H	6	Report the total dollar volume of expected credit loss from cell J-13 of the Wholesale Exposure – IPRE schedule.
A	7	Report the weighted average probability of default before consideration of credit risk mitigation from cell A-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting schedule.
D	7	Report the total dollar volume of exposure at default from cell D-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting schedule.
E	7	Report the weighted average maturity from cell C-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting schedule.
F	7	Report the weighted average loss given default from cell E-13 of the Wholesale Exposures – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting schedule.
G	7	Report the total amount of risk weighted assets from cell F-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting schedule.
H	7	Report the total dollar volume of expected credit loss from cell G-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting schedule.
A	8	Report the weighted average probability of default before consideration of credit risk mitigation from cell H-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting

Schedule B PREPARATION INSTRUCTIONS		
		schedule.
D	8	Report the total dollar volume of exposure at default from cell K-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting schedule.
E	8	Report the weighted average maturity from cell J-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting schedule.
F	8	Report the weighted average loss given default from cell L-13 of the Wholesale Exposures – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting schedule.
G	8	Report the total amount of risk weighted assets from cell M-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting schedule.
H	8	Report the total dollar volume of expected credit loss from cell N-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions and OTC Derivatives with Cross Product Netting schedule.
A	9	Report the weighted average probability of default before consideration of credit risk mitigation from cell A-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions - No Cross Product Netting schedule.
D	9	Report the total dollar volume of exposure at default from cell D-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions - No Cross Product Netting schedule.
E	9	Report the weighted average maturity from cell C-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions - No Cross Product Netting schedule.
F	9	Report the weighted average loss given default from cell E-13 of the Wholesale Exposures – Eligible margin loans, repo-style transactions - No Cross Product Netting schedule.
G	9	Report the total amount of risk weighted assets from cell F-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions - No Cross Product Netting schedule.
H	9	Report the total dollar volume of expected credit loss from cell G-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions - No Cross Product Netting schedule.
A	10	Report the weighted average probability of default before consideration of credit risk mitigation from cell H-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions - No Cross Product Netting schedule.
D	10	Report the total dollar volume of exposure at default from cell K-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions - No Cross Product Netting schedule.
E	10	Report the weighted average maturity from cell J-13 of the Wholesale Exposure – Eligible margin loans, repo-style

Schedule B PREPARATION INSTRUCTIONS		
		transactions - No Cross Product Netting schedule.
F	10	Report the weighted average loss given default from cell L-13 of the Wholesale Exposures – Eligible margin loans, repo-style transactions - No Cross Product Netting schedule.
G	10	Report the total amount of risk weighted assets from cell M-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions - No Cross Product Netting schedule.
H	10	Report the total dollar volume of expected credit loss from cell N-13 of the Wholesale Exposure – Eligible margin loans, repo-style transactions - No Cross Product Netting schedule.
A	11	Report the weighted average probability of default before consideration of credit risk mitigation from cell A-13 of the Wholesale Exposure – OTC Derivatives - No Cross Product Netting schedule.
D	11	Report the total dollar volume of exposure at default from cell D-13 of the Wholesale Exposure – OTC Derivatives - No Cross Product Netting schedule.
E	11	Report the weighted average maturity from cell C-13 of the Wholesale Exposure – OTC Derivatives - No Cross Product Netting schedule.
F	11	Report the weighted average loss given default from cell E-13 of the Wholesale Exposures – OTC Derivatives - No Cross Product Netting schedule.
G	11	Report the total amount of risk weighted assets from cell F-13 of the Wholesale Exposure – OTC Derivatives - No Cross Product Netting schedule.
H	11	Report the total dollar volume of expected credit loss from cell G-13 of the Wholesale Exposure – OTC Derivatives - No Cross Product Netting schedule.
A	12	Report the weighted average probability of default before consideration of credit risk mitigation from cell H-13 of the Wholesale Exposure – OTC Derivatives - No Cross Product Netting schedule.
D	12	Report the total dollar volume of exposure at default from cell K-13 of the Wholesale Exposure – OTC Derivatives - No Cross Product Netting schedule.
E	12	Report the weighted average maturity from cell J-13 of the Wholesale Exposure – OTC Derivatives - No Cross Product Netting schedule.
F	12	Report the weighted average loss given default from cell L-13 of the Wholesale Exposures – OTC Derivatives - No Cross Product Netting schedule.
G	12	Report the total amount of risk weighted assets from cell M-13 of the Wholesale Exposure – OTC Derivatives - No Cross Product Netting schedule.
H	12	Report the total dollar volume of expected credit loss from cell N-13 of the Wholesale Exposure – OTC Derivatives - No Cross Product Netting schedule.
A	13	Report the weighted average probability of default from cell A-16

Schedule B PREPARATION INSTRUCTIONS		
		of the Retail Exposure – Residential Mortgage – Closed-end First Lien Exposures schedule.
B	13	Report the total balance sheet amount from cell C-16 of the Retail Exposure – Residential Mortgage – Closed-end First Lien Exposures schedule.
C	13	Report the total dollar volume of undrawn exposures from cell D-16 of the Retail Exposure – Residential Mortgage – Closed-end First Lien Exposures schedule.
D	13	Report the total dollar volume of exposure at default from cell E-16 of the Retail Exposure – Residential Mortgage – Closed-end First Lien Exposures schedule.
F	13	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-16 of the Retail Exposure – Residential Mortgage – Closed-end First Lien Exposures schedule.
G	13	Report the total amount of risk weighted assets from cell H-16 of the Retail Exposure – Residential Mortgage – Closed-end First Lien Exposures schedule.
H	13	Report the total dollar volume of expected credit loss from cell I-16 of the Retail Exposure – Residential Mortgage – Closed-end First Lien Exposures schedule.
A	14	Report the weighted average probability of default from cell A-16 of the Retail Exposure – Residential Mortgage – Closed-end Junior Lien Exposures schedule.
B	14	Report the total balance sheet amount from cell C-16 of the Retail Exposure – Residential Mortgage – Closed-end Junior Lien Exposures schedule.
C	14	Report the total dollar volume of undrawn exposures from cell D-16 of the Retail Exposure – Residential Mortgage – Closed-end Junior Lien Exposures schedule.
D	14	Report the total dollar volume of exposure at default from cell E-16 of the Retail Exposure – Residential Mortgage – Closed-end Junior Lien Exposures schedule.
F	14	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-16 of the Retail Exposure – Residential Mortgage – Closed-end Junior Lien Exposures schedule.
G	14	Report the total amount of risk weighted assets from cell H-16 of the Retail Exposure – Residential Mortgage – Closed-end Junior Lien Exposures schedule.
H	14	Report the total dollar volume of expected credit loss from cell I-16 of the Retail Exposure – Residential Mortgage – Closed-end Junior Lien Exposures schedule.
A	15	Report the weighted average probability of default from cell A-16 of the Retail Exposure – Residential Mortgage – Revolving Exposures schedule.
B	15	Report the total balance sheet amount from cell C-16 of the Retail Exposure – Residential Mortgage – Revolving Exposures schedule.

Schedule B PREPARATION INSTRUCTIONS		
C	15	Report the total dollar volume of undrawn exposures from cell D-16 of the Retail Exposure – Residential Mortgage – Revolving Exposures schedule.
D	15	Report the total dollar volume of exposure at default from cell E-16 of the Retail Exposure – Residential Mortgage – Revolving Exposures schedule.
F	15	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-16 of the Retail Exposure – Residential Mortgage – Revolving Exposures schedule.
G	15	Report the total amount of risk weighted assets from cell H-16 of the Retail Exposure – Residential Mortgage – Revolving Exposures schedule.
H	15	Report the total dollar volume of expected credit loss from cell I-16 of the Retail Exposure – Residential Mortgage – Revolving Exposures schedule.
A	16	Report the weighted average probability of default from cell A-16 of the Retail Exposure – Qualifying Revolving Exposures – Credit Cards schedule.
B	16	Report the total balance sheet amount from cell C-16 of the Retail Exposure – Qualifying Revolving Exposures – Credit Cards schedule.
C	16	Report the total dollar volume of undrawn exposures from cell D-16 of the Retail Exposure – Qualifying Revolving Exposures – Credit Cards schedule.
D	16	Report the total dollar volume of exposure at default from cell E-16 of the Retail Exposure – Qualifying Revolving Exposures – Credit Cards schedule.
F	16	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-16 of the Retail Exposure – Qualifying Revolving Exposures – Credit Cards schedule.
G	16	Report the total amount of risk weighted assets from cell H-16 of the Retail Exposure – Qualifying Revolving Exposures – Credit Cards schedule.
H	16	Report the total dollar volume of expected credit loss from cell I-16 of the Retail Exposure – Qualifying Revolving Exposures – Credit Cards schedule.
A	17	Report the weighted average probability of default from cell A-16 of the Retail Exposure – Qualifying Revolving Exposures – All Other schedule.
B	17	Report the total balance sheet amount from cell C-16 of the Retail Exposure – Qualifying Revolving Exposures – All Other schedule.
C	17	Report the total dollar volume of undrawn exposures from cell D-16 of the Retail Exposure – Qualifying Revolving Exposures – All Other schedule.
D	17	Report the total dollar volume of exposure at default from cell E-16 of the Retail Exposure – Qualifying Revolving Exposures – All Other schedule.

Schedule B PREPARATION INSTRUCTIONS		
F	17	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-16 of the Retail Exposure – Qualifying Revolving Exposures – All Other schedule.
G	17	Report the total amount of risk weighted assets from cell H-16 of the Retail Exposure – Qualifying Revolving Exposures – All Other schedule.
H	17	Report the total dollar volume of expected credit loss from cell I-16 of the Retail Exposure – Qualifying Revolving Exposures – All Other schedule.
A	18	Report the weighted average probability of default from cell A-16 of the Retail Exposure – Other Retail Exposures – Small Business schedule.
B	18	Report the total balance sheet amount from cell C-16 of the Retail Exposure – Other Retail Exposures – Small Business schedule.
C	18	Report the total dollar volume of undrawn exposures from cell D-16 of the Retail Exposure – Other Retail Exposures – Small Business schedule.
D	18	Report the total dollar volume of exposure at default from cell E-16 of the Retail Exposure – Other Retail Exposures – Small Business schedule.
F	18	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-16 of the Retail Exposure – Other Retail Exposures – Small Business schedule.
G	18	Report the total amount of risk weighted assets from cell H-16 of the Retail Exposure – Other Retail Exposures – Small Business schedule.
H	18	Report the total dollar volume of expected credit loss from cell I-16 of the Retail Exposure – Other Retail Exposures – Small Business schedule.
A	19	Report the weighted average probability of default from cell A-16 of the Retail Exposure – Other Retail Exposures – All Other schedule.
B	19	Report the total balance sheet amount from cell C-16 of the Retail Exposure – Other Retail Exposures – All Other schedule.
C	19	Report the total dollar volume of undrawn exposures from cell D-16 of the Retail Exposure – Other Retail Exposures – All Other schedule.
D	19	Report the total dollar volume of exposure at default from cell E-16 of the Retail Exposure – Other Retail Exposures – All Other schedule.
F	19	Report the weighted average loss given default after consideration of credit risk mitigants (collateral, guarantees and credit derivatives) from cell G2-16 of the Retail Exposure – Other Retail Exposures – All Other schedule.
G	19	Report the total amount of risk weighted assets from cell H-16 of the Retail Exposure – Other Retail Exposures – All Other schedule.

Schedule B PREPARATION INSTRUCTIONS		
H	19	Report the total dollar volume of expected credit loss from cell I-16 of the Retail Exposure – Other Retail Exposures – All Other schedule.
B	20	Report the total amount of exposures outstanding subject to the Ratings-based Approach.
G	20	Report the total amount of risk weighted assets of exposures outstanding subject to the Ratings-based Approach.
B	21	Report the total amount of exposures outstanding subject to the Internal Assessment Approach.
G	21	Report the total amount of risk weighted assets of exposures outstanding subject to the Internal Assessment Approach.
B	22	Report the total amount of exposures outstanding subject to the Supervisory Formula.
G	22	Report the total amount of risk weighted assets of exposures outstanding subject to the Supervisory Formula.
G	23	Report the total amount of risk weighted assets of investors' interest subject to an early amortization charge.
B	24	Report the sum of cells A-2 through A-6 of the Equities schedule
G	24	Report the sum of cells B-3 through B-6 of the Equities schedule.
B	25	Report the sum of cells A-7 through A-12 of the Equities schedule
G	25	Report the amount from cell B-13 of the Equities schedule.
B	26	Report the sum of cells A-14 through A-16, and A-19 through A-21 from the equities schedule.
G	26	Report the sum of the amounts from cells B-18 and B-22 of the Equities schedule.
G	27	Report total Market Risk Equivalent Assets.
G	28	Report the amount in cell A-1 of the Operational Risk schedule, multiplied by 12.5.
B	29	Report the balance sheet amount of assets not subject to the Internal Ratings-Based Approach.
G	29	Report the total amount of risk weighted assets of assets not subject to the Internal Ratings-Based Approach
B	30	Report the balance sheet amount of assets determined to be immaterial exposures
G	30	Report the total amount of risk weighted assets determined to be immaterial exposures
G	31	Report the sum of cells G-1 through G-30 above.

Preparation Instructions for Wholesale Exposures (Schedules C through H)

GENERAL INSTRUCTIONS

Definitions	Apply the definitions provided in the NPR for the following terms: (1) probability of default (PD); (2) loss given default (LGD); (3) expected loss given default; (4) exposure at default (EAD); (5) effective maturity (M); (6) expected credit loss (ECL); (7) guarantees; (8) credit derivatives; and (9) double default treatment.
Weighted Averages	Weighted average obligor PD as used in this section is calculated by: (1) Determining the obligors and their exposures that fall within each of the PD ranges indicated, (2) multiplying each obligor's PD by its total EAD, (3) summing the products from step (2) for all exposures within each PD range, and (4) dividing the summed products from step (3) by the sum of the EADs of all exposures in the same PD range. Weighted Average LGD before effects of guarantees and credit derivatives, but after counting collateral as used in this section is calculated by: (1) Determining the obligors and their exposures that fall within each of the PD ranges indicated, (2) multiplying each exposure's LGD before considering effects of guarantees and credit derivatives, but after counting collateral by its EAD, (3) summing the products from step (2) for all exposures within each PD range, and (4) dividing the summed products from step (3) by the sum of the EADs of all exposures in the same PD range. Weighted average LGD with effects of guarantees, credit derivatives and collateral as used in this section is calculated by: (1) Determining the obligors and their exposures that fall within each of the PD ranges indicated, (2) multiplying each exposure's LGD with effects of credit risk mitigants (guarantees, credit derivatives and collateral) by its EAD, (3) summing the products from step (2) for all exposures within each PD range, and (4) dividing the summed products from step (3) by the sum of the EADs of all exposures in the same PD range. Weighted average M as used in this section is calculated by: (1) Determining the obligors and their exposures that fall within each of the PD ranges indicated, (2) multiplying each exposure's estimated M by its EAD, (3) summing the products from step (2) for all exposures within each PD range, and (4) dividing the summed products from step (3) by the sum of the EADs of all exposures in the same PD range.

WHOLESALE EXPOSURES – SCHEDULE C CORPORATE INSTRUCTIONS		
Schedule C	Wholesale - Corporate	Report all Wholesale Exposures – Corporate, which include all wholesale exposures as defined in the NPR, except those which are to be specifically included in the Wholesale Exposures - Bank, Wholesale Exposures - Sovereign, Wholesale Exposures - High Volatility Commercial Real Estate, Wholesale Exposures - Income Producing Real Estate, Wholesale Exposures - Construction Income Producing Real Estate, Eligible margin loans, Repo-style transactions, or OTC Derivatives schedules of this report.
Column	Row(s)	Instructions
A	1 – 11	Report the weighted average obligor PD of all Wholesale Exposures – Corporate where the obligor PD falls within each PD range indicated.
B	1 – 12	Report the total number of obligors included in this row for column A.
C	1 – 12	Report the total balance sheet amount of exposures included in this row for column A.
D	1 – 12	Report the total dollar value of available but undrawn balance of exposures included in this row for column A.
E	1 – 12	Report the total exposure at default (as defined in the NPR) of exposures included in this row for column A.
F	1 – 12	Report the weighted average maturity of exposures included in this row for column A.
G1	1 – 12	Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.
G2	1-12	Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of credit risk mitigants (guarantees, credit derivatives and collateral).
H1	1 – 12	Report the estimated benefit of credit risk mitigation of exposures included in this row, expressed in terms of a reduction in risk-weighted assets in dollars, arising from the application of the PD Substitution approach or the LGD Adjustment approach. The estimate can be derived by deducting the amount in column I of this row from the aggregated risk-weighted assets that would have resulted from the application of the IRB Wholesale risk-weight formula to all underlying obligations contained in this row as if they had not been hedged or guaranteed. The estimate should reflect only credit risk mitigation benefits derived from the application of the PD Substitution approach or the LGD Adjustment approach as defined in the NPR.
H2	1-12	Report the estimated benefit of credit risk mitigation of exposures included in this row, expressed in terms of a reduction in risk-weighted assets in dollars, arising from the application of the Double Default treatment. The estimate can be derived by deducting the amount in column I of this row from the aggregated risk-weighted assets that would have resulted from the application of the IRB Wholesale risk-weight formula to all underlying

WHOLESALE EXPOSURES – SCHEDULE C CORPORATE INSTRUCTIONS		
		obligations contained in this row as if they had not been hedged or guaranteed. The estimate should reflect only credit risk mitigation benefits derived from the application of the Double Default treatment as defined in the NPR.
I	1 – 12	Report the total risk weighted assets associated with all exposures included in this row for column A - after any credit risk mitigation adjustments including application of double default treatment.
J	1 – 12	Report the dollar amount of ECL for exposure included in this row for column A.
A-J	13	Calculated cells.
--	14	Report the Risk Weighted Assets of immaterial exposures reportable in this schedule but not included in the cells above.
--	15	Report the weighted average Expected Loss Given Default (ELGD) for the exposures in this category, weighting each ELGD by the exposure's associated EAD. Only report in this item if using own internal estimates of LGD.

WHOLESALE EXPOSURES – SCHEDULE D BANKS INSTRUCTIONS		
Schedule D	Wholesale – Bank	Report all Wholesale Exposures - Banks. For this schedule, Banks include the following entities: (1) banks and depository institutions as defined in the Glossary of the Reports of Condition and Income under the following headings: Banks, U.S. and Foreign; and Depository Institutions in the U.S.; (2) securities firms; and (3) government-related entities whose exposures do not have full faith & credit support of a sovereign such as Federal Home Loan Bank, Federal Agricultural Mortgage Corporation, and (4) multi-lateral development banks such as the World Bank and the Asian Development Bank that do not have full faith and credit backing of sovereign entities..
Column	Row(s)	Instructions
A	1 – 11	Report the weighted average obligor PD of all Wholesale Exposures - Banks, where the obligor falls within each PD range indicated.
B	1 – 12	Report the total number of obligors included in this row for column A.
C	1 – 12	Report the total balance sheet amount of exposures included in this row for column A.
D	1 – 12	Report the total dollar value of available but undrawn balance of exposures included in this row for column A.
E	1 – 12	Report the total exposure at default (as defined in the NPR) of exposures included in this row for column A.
F	1 – 12	Report the weighted average maturity of exposures included in this row for column A.
G1	1 – 12	Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.
G2	1-12	Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of credit risk mitigants (guarantees, credit derivatives and collateral).
H	1 – 12	Report the estimated benefit of credit risk mitigation of exposures included in this row, expressed in terms of a reduction in risk-weighted assets in dollars, arising from the application of the PD substitution and the LGD adjustment approaches. The estimate can be derived by deducting the amount in column I of this row from the aggregated risk-weighted assets that would have resulted from the application of the IRB Wholesale risk-weight formula to all underlying obligations contained in this row as if they had not been hedged or guaranteed. The estimate should reflect only credit risk mitigation benefits derived from the application of the PD substitution and the LGD adjustment approaches as defined in the NPR.
I	1 – 12	Report the total risk weighted assets associated with all exposures included in this row for column A - after any credit risk mitigation adjustments.
J	1 – 12	Report the dollar amount of ECL for exposure included in this row for column A.
A-J	13	Calculated cells.
--	14	Report the Risk Weighted Assets of immaterial exposures reportable in this schedule but not included in the cells above.
--	15	Report the weighted average Expected Loss Given Default (ELGD) for the exposures in this category, weighting each ELGD by the exposure's associated EAD. Only report in this item if using own internal estimates of LGD.

WHOLESALE EXPOSURES – SCHEDULE E SOVEREIGN INSTRUCTIONS		
Schedule E	Wholesale – Sovereign	Report all Wholesale Exposures – Sovereign (Sovereign exposures), which are defined for this schedule as: (1) direct claims on sovereign entities, (2) exposures unconditionally backed by the full faith and credit of a sovereign entity, U.S. Government-sponsored agencies such as Federal National Mortgage Association and Federal Home Loan Mortgage Corporation. Wholesale Exposures-Corporate. Wholesale exposures and sovereign entities are defined in the NPR.
Column	Row(s)	Instructions
A	1 – 11	Report the weighted average obligor PD of all Wholesale Exposures – Sovereign where the obligor PD falls within each PD range indicated.
B	1 – 12	Report the total number of obligors included in this row for column A.
C	1 – 12	Report the total book value of exposures included in this row for column A.
D	1 – 12	Report the total dollar value of available but undrawn balance of exposures included in this row for column A.
E	1 – 12	Report the total exposure at default (as defined in the NPR) of exposures included in this row for column A.
F	1 – 12	Report the weighted average maturity of exposures included in this row for column A.
G1	1 – 12	Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.
G2	1-12	Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of credit risk mitigants (guarantees, credit derivatives and collateral).
H	1 – 12	Report the estimated benefit of credit risk mitigation of exposures included in this row, expressed in terms of a reduction in risk-weighted assets in dollars, arising from the application of the PD substitution and LGD adjustment approaches. The estimate can be derived by deducting the amount in column I of this row from the aggregated risk-weighted assets that would have resulted from the application of the IRB Wholesale risk-weight formula to all underlying obligations contained in this row as if they had not been hedged or guaranteed. The estimate should reflect only credit risk mitigation benefits derived from the application of the PD substitution and LGD adjustment approaches as defined in the NPR.
I	1 – 12	Report the total risk weighted assets associated with all exposures included in this row for column A - after any credit risk mitigation adjustments.
J	1 – 12	Report the dollar amount of ECL for exposure included in this row for column A.
A-J	13	Calculated cells.
--	14	Report the Risk Weighted Assets of immaterial exposures reportable in this schedule but not included in the cells above.
--	15	Report the weighted average Expected Loss Given Default (ELGD) for the exposures in this category, weighting each ELGD by the exposure's associated EAD. Only report in this item if using own internal estimates of LGD.

WHOLESALE EXPOSURES – SCHEDULE F CONSTRUCTION INCOME PRODUCING REAL ESTATE (Construction IPRE) INSTRUCTIONS		
Schedule F	Wholesale – Construction IPRE	Report all Wholesale Exposures – Construction IPRE. Construction IPRE contains all of the following characteristics: (1) exposure must be a wholesale exposure collateralized by real estate; (2) repayment of the obligation is primarily reliant on the cash flows of the real estate serving as collateral for the exposure; (3) the exposure is (a) a construction loan or a land development loan, as defined in the Interagency Guidelines for Real Estate Lending Policies, or (b) a loan to acquire property in conjunction with a land development or construction project; (4) exposure is not to be reported in Wholesale Exposures – High Volatility Commercial Real Estate; and (5) obligor revenues are not diversified into property management, i.e. property management companies, hotel operators, real estate investment trusts, etc. Wholesale exposures are defined in the NPR.
Column	Row(s)	Instructions
A	1 – 11	Report the weighted average obligor PD of all Wholesale Exposures – Construction IPRE where the obligor PD falls within each PD range indicated.
B	1 – 12	Report the total number of obligors included in this row for column A.
C	1 – 12	Report the total balance sheet value of exposures included in this row for column A.
D	1 – 12	Report the total dollar value of available but undrawn balance of exposures included in this row for column A.
E	1 – 12	Report the total exposure at default (as defined in the NPR) of exposures included in this row for column A.
F	1 – 12	Report the weighted average maturity of exposures included in this row for column A.
G1	1 – 12	Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.
G2	1-12	Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of credit risk mitigants (guarantees, credit derivatives and collateral).
H1	1 – 12	Report the estimated benefit of credit risk mitigation of exposures included in this row, expressed in terms of a reduction in risk-weighted assets in dollars, arising from the application of the PD substitution and LGD adjustment approaches. The estimate can be derived by deducting the amount in column I of this row from the aggregated risk-weighted assets that would have resulted from the application of the IRB Wholesale risk-weight formula to all underlying obligations contained in this row as if they had not been hedged or guaranteed. The estimate should reflect only credit risk mitigation benefits derived from the application of the PD substitution and LGD adjustment approaches as defined in the NPR.
H2	1-12	Report the estimated benefit of credit risk mitigation of exposures included in this row, expressed in terms of a reduction in risk-weighted assets in dollars, arising from the application of the Double Default treatment. The estimate can be derived by deducting the amount in column I of this row from the aggregated risk-weighted assets that would have resulted from the application of the IRB Wholesale risk-weight formula to all underlying obligations

WHOLESALE EXPOSURES – SCHEDULE F CONSTRUCTION INCOME PRODUCING REAL ESTATE (Construction IPRE) INSTRUCTIONS		
		contained in this row as if they had not been hedged or guaranteed. The estimate should reflect only credit risk mitigation benefits derived from the application of the Double Default treatment as defined in the NPR.
I	1 – 12	Report the total risk weighted assets associated with all exposures included in this row for column A - after any credit risk mitigation adjustments including application of double default treatment.
J	1 – 12	Report the dollar amount of ECL for exposures included in this row for column A.
A-J	13	Calculated cells.
--	14	Report the Risk Weighted Assets of immaterial exposures reportable in this schedule but not included in the cells above.
--	15	Report the weighted average Expected Loss Given Default (ELGD) for the exposures in this category, weighting each ELGD by the exposure's associated EAD. Only report in this item if using own internal estimates of LGD.

<table>
<tr><th colspan="3">WHOLESALE EXPOSURES – SCHEDULE G HIGH VOLATILITY COMMERCIAL REAL ESTATE (HVCRE) INSTRUCTIONS</th></tr>
<tr><td>Schedule G</td><td>Wholesale
-
HVCRE</td><td>This section should report all exposures that meet the definition of HVCRE in the NPR.</td></tr>
<tr><td>Column</td><td>Row(s)</td><td>Instructions</td></tr>
<tr><td>A</td><td>1 – 11</td><td>Report the weighted average obligor PD of all Wholesale Exposures – HVCRE where the obligor PD falls within each PD range indicated.</td></tr>
<tr><td>B</td><td>1 – 12</td><td>Report the total number of obligors included in this row for column A.</td></tr>
<tr><td>C</td><td>1 – 12</td><td>Report the total balance sheet amount of exposures included in this row for column A.</td></tr>
<tr><td>D</td><td>1 – 12</td><td>Report the total dollar value of available but undrawn balance of exposures included in this row for column A.</td></tr>
<tr><td>E</td><td>1 – 12</td><td>Report the total exposure at default (as defined in the NPR) of exposures included in this row for column A.</td></tr>
<tr><td>F</td><td>1 – 12</td><td>Report the weighted average maturity of exposures included in this row for column A.</td></tr>
<tr><td>G1</td><td>1 – 12</td><td>Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.</td></tr>
<tr><td>G2</td><td>1-12</td><td>Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of credit risk mitigants (guarantees, credit derivatives and collateral).</td></tr>
<tr><td>H1</td><td>1 – 12</td><td>Report the estimated benefit of credit risk mitigation of exposures included in this row, expressed in terms of a reduction in risk-weighted assets in dollars, arising from the application of the PD substitution and the LGD adjustment approaches. The estimate can be derived by deducting the amount in column I of this row from the aggregated risk-weighted assets that would have resulted from the application of the IRB Wholesale risk-weight formula to all underlying obligations contained in this row as if they had not been hedged or guaranteed. The estimate should reflect only credit risk mitigation benefits derived from the application of the PD substitution and the LGD Adjustment approaches as defined in the NPR.</td></tr>
<tr><td>H2</td><td>1-12</td><td>Report the estimated benefit of credit risk mitigation of exposures included in this row, expressed in terms of a reduction in risk-weighted assets in dollars, arising from the application of the Double Default treatment. The estimate can be derived by deducting the amount in column I of this row from the aggregated risk-weighted assets that would have resulted from the application of the IRB Wholesale risk-weight formula to all underlying obligations contained in this row as if they had not been hedged or guaranteed. The estimate should reflect only credit risk mitigation benefits derived from the application of the Double Default treatment as defined in the NPR.</td></tr>
<tr><td>I</td><td>1 – 12</td><td>Report the total risk weighted assets associated with all exposures included in this row for column A - after any credit risk mitigation adjustments including the application of double default treatment.</td></tr>
</table>

WHOLESALE EXPOSURES – SCHEDULE G HIGH VOLATILITY COMMERCIAL REAL ESTATE (HVCRE) INSTRUCTIONS		
J	1 – 12	Report the dollar amount of ECL for exposure included in this row for column A.
A-J	13	Calculated cells.
--	14	Report the Risk Weighted Assets of immaterial exposures reportable in this schedule but not included in the cells above.
--	15	Report the weighted average Expected Loss Given Default (ELGD) for the exposures in this category, weighting each ELGD by the exposure's associated EAD. Only report in this item if using own internal estimates of LGD.

<table>
<tr><th colspan="3">WHOLESALE EXPOSURES – SCHEDULE H INCOME PRODUCING REAL ESTATE (IPRE) INSTRUCTIONS</th></tr>
<tr><td>Schedule H</td><td>Wholesale – Other IPRE</td><td>Report all Wholesale Exposures – Income Producing Real Estate (IPRE). Wholesale Exposures - IPRE contains all of the following characteristics: (1) exposure must be a wholesale exposure collateralized by real estate; (2) repayment of the obligation is primarily reliant on the cashflows of the real estate serving as collateral for the exposure; (3) purpose of the exposure is to purchase, refinance, or maintain existing property; (4) exposure is not to be reported in Wholesale Exposures – High Volatility Commercial Real Estate or Wholesale Exposures - Construction Income Producing Real Estate; and (5) obligor revenues are not diversified into property management, i.e. property management companies, hotel operators, real estate investment trusts, etc. (Wholesale exposures are defined in the NPR.)</td></tr>
<tr><td>Column</td><td>Row(s)</td><td>Instructions</td></tr>
<tr><td>A</td><td>1 – 11</td><td>Report the weighted average obligor PD of all Wholesale Exposures – IPRE where the obligor PD falls within each PD range indicated.</td></tr>
<tr><td>B</td><td>1 – 12</td><td>Report the total number of obligors included in this row for column A.</td></tr>
<tr><td>C</td><td>1 – 12</td><td>Report the total book value of exposures included in this row for column A.</td></tr>
<tr><td>D</td><td>1 – 12</td><td>Report the total dollar value of available but undrawn balance of exposures included in this row for column A.</td></tr>
<tr><td>E</td><td>1 – 12</td><td>Report the total exposure at default (as defined in the NPR) of exposures included in this row for column A.</td></tr>
<tr><td>F</td><td>1 – 12</td><td>Report the weighted average maturity of exposures included in this row for column A.</td></tr>
<tr><td>G1</td><td>1 – 12</td><td>Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.</td></tr>
<tr><td>G2</td><td>1-12</td><td>Report the weighted average LGD of exposures included in this row for column A. In estimating LGD, include the effects of credit risk mitigants (guarantees, credit derivatives and collateral).</td></tr>
<tr><td>H1</td><td>1 – 12</td><td>Report the estimated benefit of credit risk mitigation of exposures included in this row, expressed in terms of a reduction in risk-weighted assets in dollars, arising from the application of the PD substitution and LGD adjustment approaches. The estimate can be derived by deducting the amount in column I of this row from the aggregated risk-weighted assets that would have resulted from the application of the IRB Wholesale risk-weight formula to all underlying obligations contained in this row as if they had not been hedged or guaranteed. The estimate should reflect only credit risk mitigation benefits derived from the application of the PD substitution and LGD adjustment approaches as defined in the NPR.</td></tr>
<tr><td>H2</td><td>1-12</td><td>Report the estimated benefit of credit risk mitigation of exposures included in this row, expressed in terms of a reduction in risk-weighted assets in dollars, arising from the application of the Double Default treatment. The estimate can be derived by deducting the amount in column I of this row from the aggregated risk-weighted assets that would have resulted from the application of the IRB Wholesale risk-weight formula to all underlying obligations contained in this row as if they had not been hedged or guaranteed. The estimate should reflect only credit risk mitigation benefits derived from the application of the Double Default treatment as defined in the NPR.</td></tr>
</table>

WHOLESALE EXPOSURES – SCHEDULE H INCOME PRODUCING REAL ESTATE (IPRE) INSTRUCTIONS		
I	1 – 12	Report the total risk weighted assets associated with all exposures included in this row for column A - after any credit risk mitigation adjustments.
J	1 – 12	Report the dollar amount of ECL for exposures included in this row for column A.
A-J	13	Calculated cells.
--	14	Report the Risk Weighted Assets of immaterial exposures reportable in this schedule but not included in the cells above.
--	15	Report the weighted average Expected Loss Given Default (ELGD) for the exposures in this category, weighting each ELGD by the exposure's associated EAD. Only report in this item if using own internal estimates of LGD.

Preparation Instructions for Eligible Margin Loans, Repo-Style Transactions, OTC Derivatives, and Combinations of these Instruments Subject to Qualifying Master Netting Agreements (Schedules I through K)

GENERAL INSTRUCTIONS	
Definitions	Apply the definitions provided in the NPR for the following terms: (1) probability of default (PD); (2) loss given default (LGD); (3) expected loss given default (ELGD); (4) exposure at default (EAD); (5) effective maturity (M); and (6) expected credit loss (ECL).
Weighted Averages	Weighted average PD as used in this section is calculated by: (1) Determining the exposures that have estimated PDs prior to considering the effects of credit risk mitigation (pre-CRM PD) that fall within each of the PD ranges indicated, (2) summing the products from step (1) for all exposures within each PD range, and (3) dividing the summed products from step (2) by the sum of the EADs of all exposures in the same PD range. Weighted average LGD as used in this section is calculated by: (1) Determining the obligors and their exposures that have estimated PDs prior to considering the effects of credit risk mitigation that fall within each of the PD ranges indicated, (2) multiplying each exposure's LGD by its EAD, (3) summing the products from step (2) for all exposures within each PD range, and (4) dividing the summed products from step (3) by the sum of the EADs of all exposures in the same PD range. Weighted average M as used in this section is calculated by: (1) Determining the obligors and their exposures that have estimated PDs prior to considering the effects of credit risk mitigation that fall within each of the PD ranges indicated, (2) multiplying each exposure's estimated M by its EAD, (3) summing the products from step (2) for all exposures within each PD range, and (4) dividing the summed products from step (3) by the sum of the EADs of all exposures in the same PD range.

WHOLESALE EXPOSURES – SCHEDULE I ELIGIBLE MARGIN LOANS/REPO-STYLE / OTC DERIVATIVES WITH CROSS-PRODUCT NETTING INSTRUCTIONS		
Schedule I	Wholesale - Corporate	Report all eligible margin loans, repo-style transactions and OTC Derivatives positions that are subject to a qualified master netting agreement as defined in the NPR. Exposures that are not covered by netting agreements or whose netting agreements do not meet the standard called for in the NPR to qualify for netting under the capital rules will be reported separately as gross exposures in the following two schedules.
Column	Row(s)	Instructions
		COLUMNS A THROUGH G CONTAIN DATA ONLY FOR NET EXPOSURES WHERE THE BANK USED THE EAD ADJUSTMENT METHOD FOR DETERMINING RISK WEIGHTED ASSETS. EXPOSURES CALCULATED USING ADJUSTED LGDS SHOULD BE REPORTED IN COLUMNS H THROUGH N.
A	1 – 11	Report the weighted average PD of all Wholesale Exposures – Corporate where the obligor PD - before any credit risk mitigation adjustments - falls within each PD range indicated.
B	1 – 12	Report the total number of unique counterparties included in this row for column A.
C	1 – 12	Report the weighted average maturity in years of exposures included in this row for column A, calculated to two decimal places.
D	1 – 12	Report the total Exposure at Default (EAD, as defined in the NPR) of exposures included in this row for column A.
E	1 – 12	Report the weighted average LGD of exposures included in this row for column A.
F	1 – 12	Report the total risk weighted assets associated with all exposures included in this row for column A after any adjustments for eligible guarantees and eligible credit derivatives.
G	1-12	Report the Expected Credit Loss, as defined in the NPR, associated with the exposures aggregated in this row for column A.
		COLUMNS H THROUGH N CONTAIN DATA ONLY FOR NET EXPOSURES WHERE THE BANK USED ADJUSTED LGDS FOR DETERMINING RISK WEIGHTED ASSETS. EXPOSURES CALCULATED USING THE EAD ADJUSTMENT METHODS SHOULD BE REPORTED IN COLUMNS A THROUGH G.
H	1 – 11	Report the weighted average PD of all Wholesale Exposures – Corporate where the obligor PD - before any credit risk mitigation adjustments - falls within each PD range indicated.
I	1 – 12	Report the total number of unique counterparties included in this row for column H.

WHOLESALE EXPOSURES – SCHEDULE I ELIGIBLE MARGIN LOANS/REPO-STYLE / OTC DERIVATIVES WITH CROSS-PRODUCT NETTING INSTRUCTIONS		
J	1 – 12	Report the weighted average maturity in years of exposures included in this row for column G, calculated to two decimal places.
K	1 – 12	Report the total Exposure at Default (EAD, as defined in the NPR) of exposures included in this row for column H.
L	1 – 12	Report the weighted average LGD of exposures included in this row for column H.
M	1 – 12	Report the total risk weighted assets associated with all exposures included in this row for column H - after any adjustments eligible guarantees and eligible credit derivatives.
N	1-12	Report the Expected Credit Loss, as defined in the NPR, associated with the exposures aggregated in this row for column H.

WHOLESALE EXPOSURES – SCHEDULE J ELIGIBLE MARGIN LOANS AND REPO-STYLE TRANSACTIONS/ SEC LEND / SECURED OTS DERIVATIVES NOT QUALIFIED FOR NETTING TREATMENT INSTRUCTIONS		
Schedule J	Wholesale - Corporate	Report all eligible margin loans and repo-style transactions that are NOT subject to a qualifying master netting agreement as defined in the NPR. Exposures that are not covered by qualifying master netting agreements should be reported here as gross exposures in the following two schedules.
Column	Row(s)	Instructions
		COLUMNS A THROUGH G CONTAIN DATA ONLY FOR REPO, REPO-LIKE AND SECURITIES LENDING TRANSACTIONS WHERE THE BANK USED THE EAD ADJUSTMENT METHOD FOR DETERMINING RISK WEIGHTED ASSETS. EXPOSURES CALCULATED USING ADJUSTED LGDS SHOULD BE REPORTED IN COLUMNS H THROUGH N.
A	1 – 11	Report the weighted average PD of all Wholesale Exposures – Corporate where the obligor PD- before any credit risk mitigation adjustments - falls within each PD range indicated.
B	1 – 12	Report the total number of unique counterparties included in this row for column A.
C	1 – 12	Report the weighted average maturity in years of exposures included in this row for column A, calculated to two decimal places.
D	1 – 12	Report the total Exposure at Default (EAD, as defined in the NPR) of exposures included in this row for column A.
E	1 – 12	Report the weighted average LGD of exposures included in this row for column A.
F	1 – 12	Report the total risk weighted assets associated with all exposures included in this row for column A after any adjustments for eligible guarantees and eligible credit derivatives.
G	1-12	Report the Expected Credit Loss, as defined in the NPR, associated with the exposures aggregated in this row for column A.
		COLUMNS H THROUGH N CONTAIN DATA ONLY FOR ELIGIBLE MARGIN LOANS AND REPO – STYLE TRANSACTIONS WHERE THE BANK USED ADJUSTED LGDS FOR DETERMINING RISK WEIGHTED ASSETS. EXPOSURES CALCULATED USING THE EAD ADJUSTMENT METHODS SHOULD BE REPORTED IN COLUMNS A ATHROUGH G.
H	1 – 11	Report the weighted average PD of all Wholesale Exposures – Corporate where the obligor PD - before any credit risk mitigation adjustments - falls within each PD range indicated.

WHOLESALE EXPOSURES – SCHEDULE J ELIGIBLE MARGIN LOANS AND REPO-STYLE TRANSACTIONS/ SEC LEND / SECURED OTS DERIVATIVES NOT QUALIFIED FOR NETTING TREATMENT INSTRUCTIONS		
I	1 – 12	Report the total number of unique counterparties included in this row for column H.
J	1 – 12	Report the weighted average maturity in years of exposures included in this row for column H, calculated to two decimal places.
K	1 – 12	Report the total Exposure at Default (EAD, as defined in the NPR) of exposures included in this row for column H.
L	1 – 12	Report the weighted average LGD of exposures included in this row for column H.
M	1 – 12	Report the total risk weighted assets associated with all exposures included in this row for column H after adjustments for eligible guarantees and eligible credit derivatives.
N	1-12	Report the total Expected Credit Loss (ECL) for the exposures reported in this row for column H.
O	Row 15, cells: L-1 L-2 L-3	Report the percentage, to one decimal place, of total EAD for this schedule calculated by the methods listed. L-1 is for the percentage EAD calculated by collateral haircuts, L-2 is for the percentage EAD calculated by Simple VaR, and L-3 is for the percentage EAD calculated using Internal Models. Report the method that is used for each exposure type (for example, simple VaR for repo-style transactions, haircuts for collateralized derivatives).

WHOLESALE EXPOSURES – SCHEDULE K OTC DERIVATIVES NOT QUALIFIED FOR NETTING TREATMENT INSTRUCTIONS		
Schedule K	Wholesale - Corporate	Report all OTC Derivative positions which are NOT subject to a qualifying master netting agreement as defined in the NPR. Exposures that are not covered by qualifying master netting agreements should be reported here as gross exposures in the following two schedules.
Column	Row(s)	Instructions
		COLUMNS A THROUGH G CONTAIN DATA ONLY FOR OTC DERIVATIVES WHERE THE BANK USED THE EAD ADJUSTMENT METHOD FOR DETERMINING RISK WEIGHTED ASSETS. EXPOSURES CALCULATED USING ADJUSTED LGDS SHOULD BE REPORTED IN COLUMNS H THROUGH N.
A	1 – 11	Report the weighted average PD of all Wholesale Exposures – Corporate where the obligor PD falls within each PD range indicated.
B	1 – 12	Report the total number of unique counterparties included in this row for column A.
C	1 – 12	Report the weighted average maturity in years of exposures included in this row for column A, calculated to two decimal places.
D	1 – 12	Report the total Exposure at Default (EAD, as defined in the NPR) of exposures included in this row for column A.
E	1 – 12	Report the weighted average LGD of exposures included in this row for column A.
F	1 – 12	Report the total risk weighted assets associated with all exposures included in this row for column A after any adjustments for eligible guarantees and eligible credit derivatives.
G	1-12	Report the total Expected Credit Loss (ECL) for the exposures reported in this row for column A.
		COLUMNS H THROUGH N CONTAIN DATA ONLY FOR OTC DERIVATIVES WHERE THE BANK USED ADJUSTED LGDS FOR DETERMINING RISK WEIGHTED ASSETS. EXPOSURES CALCULATED USING THE EAD ADJUSTMENT METHODS SHOULD BE REPORTED IN COLUMNS A THROUGH G.
H	1 – 11	Report the weighted average PD of all Wholesale Exposures – Corporate where the obligor PD falls within each PD range indicated.
I	1 – 12	Report the total number of unique counterparties included in this row for column G.
J	1 – 12	Report the weighted average maturity in years of exposures included in this row for column G, calculated to two decimal places.
K	1 – 12	Report the total Exposure at Default (EAD, as defined in the NPR) of exposures included in this row for column A.

WHOLESALE EXPOSURES – SCHEDULE K OTC DERIVATIVES NOT QUALIFIED FOR NETTING TREATMENT INSTRUCTIONS		
L	1 – 12	Report the weighted average LGD of exposures included in this row for column G.
M	1 – 12	Report the total risk weighted assets associated with all exposures included in this row for column G after any adjustments for eligible guarantees and eligible credit derivatives.
N	1 - 12	Report the total Expected Credit Loss (ECL) for the exposures reported in this row for Column H.
O	Row 15, cells: L-1 L-2	Report the percentage, to one decimal place, of total EAD for this schedule calculated by the methods listed. L-1 is for the percentage EAD calculated by collateral haircuts and L-2 is for the percentage EAD calculated using Internal Models.

Preparation Instructions for Retail Exposures (Schedules L through R)

GENERAL INSTRUCTIONS	
These templates should reflect summary or aggregate information based on the bank's own segmentation system for risk-based capital purposes. For each retail category, banks should use the PDs calculated in its segmentation process and report each PD (and related segment information) in the corresponding estimated PD range.	
Definitions	Apply the definitions provided in the NPR for the following terms: (1) probability of default (PD); (2) loss given default (LGD); (3) expected loss given default; (4) exposure at default (EAD); (5) expected credit loss (ECL); (6) guarantees; and (7) credit derivatives.
Loan-to-Value	Loan to Value: Where LTV information is requested, reporting of these cells is required only if LTVs are available. If LTVs are used in the segmentation process, report the LTV that is used in the segmentation process. If LTVs are not used in the segmentation process, report the most recent well-supported LTV for the exposures (original or well supported updated LTV).
Credit Risk Score	Credit Risk Score: Reporting of these cells is required only if the scores are available. Report scores only from credit scoring systems with a common mapping from scores to default probabilities and/or expected losses. Where two or more credit scoring systems with different mappings are used in the same portfolio, report scores only from the system used for the largest number of exposures in that portfolio.

GENERAL INSTRUCTIONS

Weighted Averages	Weighted average PD as used in this section is calculated by: (1) Determining the exposures that are in risk segments whose PDs fall within each of the PD ranges indicated, (2) multiplying each segment's PD by its EAD, (3) summing the products from step (2) for all segments within each PD range, and (4) dividing the summed products from step (3) by the sum of the EADs of all segments in the same PD range. Weighted Average LGD before effects of guarantees and credit derivatives, but after counting collateral as used in this section is calculated by: (1) Determining the segments that have PDs that fall within each of the PD ranges indicated, (2) multiplying each segment's LGD before considering effects of guarantees and credit derivatives, but after counting collateral by its EAD, (3) summing the products from step (2) for all segments within each PD range, and (4) dividing the summed products from step (3) by the sum of the EADs of all segments in the same PD range. Weighted average LGD with effects of guarantees, credit derivatives and collateral as used in this section is calculated by: (1) Determining the segments that have PDs that fall within each of the PD ranges indicated, (2) multiplying each segment's LGD with effects of credit risk mitigants (guarantees, credit derivatives and collateral) by its EAD, (3) summing the products from step (2) for all segments within each PD range, and (4) dividing the summed products from step (3) by the sum of the EADs of all segments in the same PD range. Weighted average credit score and Weighted Average Age are calculated in the same manner but weighted by number of accounts.
Average Age	Average Age is defined as number of months since loan origination.

RETAIL EXPOSURES – SCHEDULE L RESIDENTIAL MORTGAGE - NON-REVOLVING FIRST LIENS INSTRUCTIONS		
Schedule L	Residential Mortgage Exposures (First Liens)	Report all Residential Mortgage Exposures as defined in the NPR that (1) are secured by first liens, and (2) are not revolving lines of credit.
Column	Row(s)	Instructions
A	1 – 15	Report the weighted average PD of all segments of exposures applicable to this section as noted above, whose IRB PD falls within each range indicated.
B	1 – 15	Report the total number of exposures in all segments included in this row for column A.
C	1 – 15	Report the total balance sheet amount of exposures within the segments included in this row for column A.
D	1 – 15	Report the dollar volume of available but undrawn balances of exposures within the segments included in this row for column A. Include undrawn commitments to lend, including available negative amortization and unfunded mortgage commitments.
E	1 – 15	Report the total EAD of segments of exposures included in this row for column A.
F	1 – 15	Report the weighted average age of exposures in the segments included in this row for column A.
G1	1 – 15	Report the weighted average LGD of exposures in the segments included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.
G2	1 – 15	Report the weighted average LGD of exposures in the segments included in this row for column A. In estimating LGD, do include the effects of credit risk mitigants (collateral, guarantees and credit derivatives).
H	1 – 15	Report total risk-weighted assets associated with all segments of exposures included in this row for column A.
I	1 – 15	Report the dollar volume of ECL for segments of exposures included in this row for column A.
J	1 – 15	Report the EAD of exposures included in this row for column A that have less than a 70% LTV.
K	1 – 15	Report the EAD of exposures included in this row for column A that have at least a 70% but less than 80% LTV.
L	1 – 15	Report the EAD of exposures included in this row for column A that have at least an 80% but less than 90% LTV.
M	1 – 15	Report the EAD of exposures included in this row for column A that have at least a 90% but not more than 100% LTV.
N	1 – 15	Report the EAD of exposures included in this row for column A that have a 100+% LTV.
O	1 – 15	Report the weighted average credit risk score of exposures in the segments included in this row for column A.
P	1 - 15	Report the EAD of accounts that are included in the segments reported in this row where the LTV has been updated since the last report date for portfolio management purposes, that is, the updated LTV is based upon a

RETAIL EXPOSURES – SCHEDULE L RESIDENTIAL MORTGAGE - NON-REVOLVING FIRST LIENS INSTRUCTIONS		
		refreshed assessment of the collateral value. If LTVs were not updated for any accounts in the segments reported in the row since the last report date, report 0.
A - P	16	Calculated cells.
--	17	Report the risk-weighted assets of immaterial exposures reportable in this schedule but not included in the above cells.
--	18	Report the subcategory weighted average Expected Loss Given Default (ELGD), weighting each ELGD by the exposure's associated EAD calculated using the bank's internal estimates of LGD. Report in this item only if using own internal estimate of LGD.
--	19	Report the name of the credit bureau or credit scoring system used to produce the values in column O.

RETAIL EXPOSURES – SCHEDULE M RESIDENTIAL MORTGAGE – NON-REVOLVING JUNIOR LIENS INSTRUCTIONS		
Schedule M	Residential Mortgage Exposures (Non-Revolving Junior Liens)	Report all Residential Mortgage Exposures as defined in the NPR that (1) are secured by liens subordinate to any other lien, and (2) are not revolving.
Column	Row(s)	Instructions
A	1 – 15	Report the weighted average PD of all segments of exposures applicable to this section as noted above, whose IRB PD falls within each range indicated.
B	1 – 15	Report the total number of exposures in all segments included in this row for column A.
C	1 – 15	Report the total balance sheet amount of exposures within the segments included in this row for column A.
D	1 – 15	Report the dollar volume of available but undrawn balances of exposures within the segments included in this row for column A. Include undrawn commitments to lend, including available negative amortization and unfunded mortgage commitments.
E	1 – 15	Report the total EAD of segments of exposures included in this row for column A.
F	1 – 15	Report the weighted average age of exposures in the segments included in this row for column A.
G1	1 – 15	Report the weighted average LGD of exposures in the segments included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.
G2	1 – 15	Report the weighted average LGD of exposures in the segments included in this row for column A. In estimating LGD, do include the effects of credit risk mitigants (collateral, guarantees and credit derivatives).
H	1 – 15	Report total risk-weighted assets associated with all segments of exposures included in this row for column A.
I	1 – 15	Report the dollar volume of ECL for segments of exposures included in this row for column A.
J	1 – 15	Report the EAD of exposures included in this row for column A that have less than a 70% LTV.
K	1 – 15	Report the EAD of exposures included in this row for column A that have at least a 70% but less than 80% LTV.
L	1 – 15	Report the EAD of exposures included in this row for column A that have at least an 80% but less than 90% LTV.
M	1 – 15	Report the EAD of exposures included in this row for column A that have at least a 90% but not more than 100% LTV.
N	1 – 15	Report the EAD of exposures included in this row for column A that have a 100+% LTV.
O	1 – 15	Report the weighted average credit risk score of exposures in the segments included in this row for column A.

RETAIL EXPOSURES – SCHEDULE M RESIDENTIAL MORTGAGE – NON-REVOLVING JUNIOR LIENS INSTRUCTIONS		
P	1 - 15	Report the EAD of accounts that are included in the segments reported in this row where the LTV has been updated since the last report date for portfolio management purposes, that is, the updated LTV is based upon a refreshed assessment of the collateral value. If LTVs were not updated for any accounts in the segments reported in the row since the last report date, report 0.
A - P	16	Calculated cells.
--	17	Report the risk-weighted assets of immaterial exposures reportable in this schedule but not included in the above cells.
--	18	Report the subcategory weighted average Expected Loss Given Default (ELGD), weighting each ELGD by the exposure's associated EAD calculated using the bank's internal estimates of LGD. Report in this item only if using own internal estimate of LGD.
--	19	Report the name of the credit bureau or credit scoring system used to produce the values in column O.

RETAIL EXPOSURES – SCHEDULE N RESIDENTIAL MORTGAGE – REVOLVING EXPOSURES INSTRUCTIONS		
Schedule N	Residential Mortgage Exposures (Revolving Exposures)	Report all Residential Mortgage Exposures as defined in the NPR that are revolving.
Column	Row(s)	Instructions
A	1 – 15	Report the weighted average PD of the segments whose PDs fall within each of the PD ranges indicated.
B	1 – 15	Report the total number of exposures in all segments included in this row for column A.
C	1 – 15	Report the total balance sheet amount value of exposures within the segments included in this row for column A.
D	1 – 15	Report the dollar volume of available but undrawn balances of exposures within the segments included in this row for column A. Include undrawn commitments to lend, including available negative amortization and unfunded mortgage commitments.
E	1 – 15	Report the total EAD of segments of exposures included in this row for column A.
F	1 – 15	Report the weighted average age of exposures in the segments included in this row for column A.
G1	1 – 15	Report the weighted average LGD of exposures in the segments included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.
G2	1 – 15	Report the weighted average LGD percentage of exposures in the segments included in this row for column A. In estimating LGD, do include the effects of credit risk mitigants (collateral, guarantees and credit derivatives).
H	1 – 15	Report total risk-weighted assets associated with all segments of exposures included in this row for column A.
I	1 – 15	Report the dollar amount of ECL for segments of exposures included in this row for column A.
J	1 – 15	Report the EAD of exposures included in this row for column A that have less than a 70% LTV.
K	1 – 15	Report the EAD of exposures included in this row for column A that have at least a 70% but less than 80% LTV.
L	1 – 15	Report the EAD of exposures included in this row for column A that have at least an 80% but less than 90% LTV.
M	1 – 15	Report the EAD of exposures included in this row for column A that have at least a 90% but not more than 100% LTV.
N	1 – 15	Report the EAD of exposures included in this row for column A that are have a 100+% LTV.
O	1 – 15	Report the weighted average credit risk score of exposures in the segments included in this row for column A.
P	1 - 15	Report the EAD of accounts that are included in the segments reported in this row where the LTV has been updated since the last report date for

RETAIL EXPOSURES – SCHEDULE N RESIDENTIAL MORTGAGE – REVOLVING EXPOSURES INSTRUCTIONS		
		portfolio management purposes, that is, the updated LTV is based upon a refreshed assessment of the collateral value. If LTVs were not updated for any accounts in the segments reported in the row since the last report date, report 0.
A - P	16	Calculated cells.
--	17	Report the risk-weighted assets of immaterial exposures reportable in this schedule but not included in the above cells.
--	18	Report the subcategory weighted average Expected Loss Given Default (ELGD), weighting each ELGD by the exposure's associated EAD calculated using the bank's internal estimates of LGD. Report in this item only if using own internal estimate of LGD.
--	19	Report the name of the credit bureau or credit scoring system used to produce the values in column O.

RETAIL EXPOSURES – SCHEDULE O QUALIFYING REVOLVING EXPOSURES – CREDIT CARDS INSTRUCTIONS		
Schedule O	QRE (Credit Cards)	Report all Qualifying Revolving Exposures as defined in the NPR, in which the obligor is issued a credit card to access available funds.
Column	Row(s)	Instructions
A	1 – 15	Report the weighted average PD of the segments whose PDs fall within each of the PD ranges indicated.
B	1 – 15	Report the total number of exposures in all segments included in this row for column A.
C	1 – 15	Report the total balance sheet amount of exposures within the segments included in this row for column A.
D	1 – 15	Report the dollar amount of available but undrawn balances of exposures within the segments included in this row for column A.
E	1 – 15	Report the total EAD of segments of exposures included in this row for column A.
F	1 – 15	Report the total EAD for the exposures in the segments included in this row for column A that are less than 2 years old.
G1	1 – 15	Report the weighted average LGD of exposures in the segments included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.
G2	1 – 15	Report the weighted average LGD of exposures in the segments included in this row for column A. In estimating LGD, do include the effects of credit risk mitigants (collateral, guarantees and credit derivatives).
H	1 – 15	Report total risk-weighted assets associated with all segments of exposures included in this row for column A.
I	1 – 15	Report the dollar amount of ECL for segments of exposures included in this row for column A.
J	1 – 15	Report the weighted average credit risk score of exposures in the segments included in this row for column A.
A - J	16	Calculated cells.
--	17	Report the risk-weighted assets of immaterial exposures reportable in this schedule but not included in the above cells.
--	18	Report the subcategory weighted average Expected Loss Given Default (ELGD), weighting each ELGD by the exposure's associated EAD calculated using the bank's internal estimates of LGD. Report in this item only if using own internal estimate of LGD.
--	19	Report the name of the credit bureau or credit scoring system used to produce the values in column J.

RETAIL EXPOSURES – SCHEDULE P QUALIFYING REVOLVING EXPOSURES – ALL OTHER INSTRUCTIONS		
Schedule P	QRE (Other)	Report all other Qualifying Revolving Exposures as defined in the NPR, except those reported in Schedule O.
Column	Row(s)	Instructions
A	1 – 15	Report the weighted average PD of the segments whose PDs fall within each of the PD ranges indicated
B	1 – 15	Report the total number of exposures in all segments included in this row for column A.
C	1 – 15	Report the total balance sheet amount of exposures within the segments included in this row for column A.
D	1 – 15	Report the dollar amount of available but undrawn balances of exposures within the segments included in this row for column A.
E	1 – 15	Report the total EAD of segments of exposures included in this row for column A.
F	1 – 15	Report the total EAD for the exposures in the segments included in this row for column A that are less than 2 years old.
G1	1 – 15	Report the weighted average LGD of segments of exposures in the segments included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.
G2	1 – 15	Report the weighted average LGD percentage of exposures in the segments included in this row for column A. In estimating LGD, include the effects of credit risk mitigants (collateral, guarantees and credit derivatives).
H	1 – 15	Report total risk weighted assets associated with all segments of exposures included in this row for column A.
I	1 – 15	Report the dollar amount of ECL for segments of exposures included in this row for column A.
J	1 – 15	Report the weighted average credit risk score of exposures in the segments included in this row for column A.
A - J	16	Calculated cells.
--	17	Report the risk-weighted assets of immaterial exposures reportable in this schedule but not included in the above cells.
--	18	Report the subcategory weighted average Expected Loss Given Default (ELGD), weighting each ELGD by the exposure's associated EAD calculated using the bank's internal estimates of LGD. Report in this item only if using own internal estimate of LGD.
--	19	Report the name of the credit bureau or credit scoring system used to produce the values in column J.

RETAIL EXPOSURES – SCHEDULE Q OTHER RETAIL EXPOSURES – SMALL BUSINESS INSTRUCTIONS		
Schedule Q	Other Retail Exposure (Small Business)	Report Other Retail Exposures as defined in the NPR, to an individual or company for business purposes if the bank's consolidated business credit exposure to the individual or company is $1 million or less.
Column	Row(s)	Instructions
A	1 – 15	Report the weighted average PD of the segments whose PDs fall within each of the PD ranges indicated
B	1 – 15	Report the total number of exposures in all segments included in this row for column A.
C	1 – 15	Report the total balance sheet amount of exposures within the segments included in this row for column A.
D	1 – 15	Report the dollar amount of available but undrawn balances of exposures within the segments included in this row for column A.
E	1 – 15	Report the total EAD of segments of exposures included in this row for column A.
F	1 – 15	Report the total EAD for the exposures in the segments included in this row for column A that are less than 2 years old.
G1	1 – 15	Report the weighted average LGD of exposures in the segments included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.
G2	1 – 15	Report the weighted average LGD of exposures in the segments included in this row for column A. In estimating LGD, include the effects of credit risk mitigants (collateral, guarantees and credit derivatives).
H	1 – 15	Report total risk weighted assets associated with all segments of exposures included in this row for column A.
I	1 – 15	Report the dollar amount of ECL for segments of exposures included in this row for column A.
J	1 – 15	Report the weighted average credit risk score of exposures in the segments included in this row for column A.
A - J	16	Calculated cells.
--	17	Report the risk-weighted assets of immaterial exposures reportable in this schedule but not included in the above cells.
--	18	Report the subcategory weighted average Expected Loss Given Default (ELGD), weighting each ELGD by the exposure's associated EAD calculated using the bank's internal estimates of LGD. Report in this item only if using own internal estimate of LGD.
--	19	Report the name of the credit bureau or credit scoring system used to produce the values in column J.

RETAIL EXPOSURES – SCHEDULE R OTHER RETAIL EXPOSURES – ALL OTHER INSTRUCTIONS		
Schedule R	Other Retail Exposure	Report Other Retail Exposures as defined in the NPR, except those reported in Schedule Q.
Column	Row(s)	Instructions
A	1 – 15	Report the weighted average PD of the segments whose PDs fall within each of the PD ranges indicated
B	1 – 15	Report the total number of exposures in all segments included in this row for column A.
C	1 – 15	Report the total balance sheet amount of exposures within the segments included in this row for column A.
D	1 – 15	Report the dollar amount of available but undrawn balances of exposures within the segments included in this row for column A.
E	1 – 15	Report the total EAD of segments of exposures included in this row for column A.
F	1 – 15	Report the total EAD for the exposures in the segments included in this row for column A that are less than 2 years old.
G1	1 – 15	Report the weighted average LGD of exposures in the segments included in this row for column A. In estimating LGD, include the effects of collateral but not the effects of guarantees or credit derivatives.
G2	1 – 15	Report the weighted average LGD of the exposures in the segments included in this row for column A. In estimating LGD, include the effects of credit risk mitigants (collateral, guarantees and credit derivatives).
H	1 – 15	Report total risk-weighted assets associated with all segments of exposures included in this row for column A.
I	1 – 15	Report the dollar amount of ECL for segments of exposures included in this row for column A.
J	1 – 15	Report the weighted average credit risk score of exposures in the segments included in this row for column A.
A - J	16	Calculated cells.
--	17	Report the risk-weighted assets of immaterial exposures reportable in this schedule but not included in the above cells.
--	18	Report the subcategory weighted average Expected Loss Given Default (ELGD), weighting each ELGD by the exposure's associated EAD calculated using the bank's internal estimates of LGD. Report in this item only if using own internal estimate of LGD.
--	19	Report the name of the credit bureau or credit scoring system used to produce the values in column J.

Preparation Instructions for Securitization Exposures (Schedules S and T)

INSTRUCTIONS FOR SECURITIZATION EXPOSURES – SCHEDULE S		
Schedule S	RBA and IAA	Report the aggregate amount of securitization exposures in each line item that correspond to a particular rating category, separating those subject to the RBA from those subject to the IAA. Report RWA for each line item in the last column. Do not include exposures that require deduction and should be reported in Schedule A. If a securitization exposure benefits from credit risk mitigation, reflect such credit risk mitigation in risk-weighted assets. However, enter the entire notional amount of the exposure into the appropriate column according to its external or inferred rating.
Schedule S	5A – 5C	Report the sums of each of the columns from items 1 through 4 in Schedule S in columns A through C.

INSTRUCTIONS FOR SECURITIZATION EXPOSURES – SCHEDULE T		
Schedule T	1C – 2C	In column C, report the aggregate amount that must be deducted.. Report the amount that must be deducted for unrated exposures with non-IRB underlying exposures in line 1 and the amount that must be deducted due to a 1250 percent or greater risk weight under the SFA in line 2. Do not use columns A or B. These amounts should also be reported in the Call Report Schedule RC-R, FR Y-9C Report Schedule HC-R, or TFR Schedule CCR.
Schedule T	3A – 3B	In column A, report the total dollar amount of notional exposures to synthetic securitizations. In column B, report the RWA associated with those exposures. Do not use column C.
Schedule T	4A – 4B	In column A, report the total dollar amount of positions in synthetic securitizations hedged by collateral or eligible guarantees or eligible credit derivatives from eligible securitization guarantors. In column B, report the amount of RWA associated with these hedged positions. Do not use column C.
Schedule T	5B	In column B, report the amount of RWA that would have been required for the all securitization exposures if the capital requirement were not capped under section 42(d) of the proposed rule. For purposes of this cell only, convert amounts required to be deducted into risk-weighted assets by multiplying them by 1250 percent.
Schedule T	6A-7B	Report EAD and RWA associated with the investors' interest in revolving securitizations that could be subject to an early amortization capital requirement. Report amounts associated with retail credit lines (e.g., individual credit card lines) in line 6 and with non-retail credit lines in line 7.

Preparation Instructions for Equity Exposures (Schedule U)

INSTRUCTIONS FOR EQUITY EXPOSURES – SCHEDULE U
(Refer to the NPR for Equity Exposure terms and definitions)

Data Description	Row(s)	Instructions
Total Equity Exposures	1	In line 1, column A, report the aggregate adjusted carrying value of equity exposures that are subject to Part VI of the NPR. Do not include exposures subject to the market risk capital framework.
Excluded Equity Exposures – 0% Risk Weight Exposures	2	In line 2, column A, report the adjusted carrying value of equity exposures that are sovereign exposures or exposures to the Bank for International Settlements, the International Monetary Fund, the European Commission, the European central bank or a multi-lateral development bank.
Excluded Equity Exposures – FHLB/Farmer Mac Equity Exposures – 20% Risk Weight	3	In line 3, column A, report the aggregate adjusted carrying value of equity exposures to a Federal Home Loan Bank or Farmer Mac that are not publicly traded and are held as a condition of membership in that entity. In line 3, column B, report the product of line 3, column A and 20 percent.
Excluded Equity Exposures – FHLB/Farmer Mac Equity Exposures – 100% Risk Weight	4	In line 4, column A, report the aggregate adjusted carrying value of equity exposures to a Federal Home Loan Bank or Farmer Mac not reported in line 3, column A. In line 4, column B, report the amount contained in line 4, column A.

INSTRUCTIONS FOR EQUITY EXPOSURES – SCHEDULE U (Refer to the NPR for Equity Exposure terms and definitions)		
Excluded Equity Exposures – Community Development Equity Exposures – 100% Risk Weight	5	In line 5, column A, report the aggregate adjusted carrying value of community development equity exposures. In line 5, column B, report the amount contained in line 5, column A.
Equity Exposures to Investment Funds	6	In line 6, column A, report the adjusted carrying value of all equity exposures to investment funds. In line 6, column B, report RWA for all equity exposures to investment funds.
	6a	In line 6a, column A, report the adjusted carrying value of all equity exposures to investment funds to which the bank applies the full look-through approach. In line 6a, column B, report RWA for all equity exposures to investment funds to which the bank applies the full look-through approach.
	6b	In line 6b, column A, report the adjusted carrying value of all equity exposures to investment funds to which the bank applies the simple modified look-through approach. In line 6b, column B, report RWA for all equity exposures to investment funds to which the bank applies the simple modified look-through approach.
	6c	In line 6c, column A, report the adjusted carrying value of all equity exposures to investment funds to which the bank applies the alternative modified look-through approach. In line 6c, column B, report RWA for all equity exposures to investment funds to which the bank applies the alternative modified look-through approach.
Simple Risk-Weight Approach Calculations		Lines 7 through 13 are to be completed by banks that use the simple risk-weight approach.

INSTRUCTIONS FOR EQUITY EXPOSURES – SCHEDULE U (Refer to the NPR for Equity Exposure terms and definitions)		
Excluded Exposures to Investment Funds	7	In line 7, column A, report the aggregate adjusted carrying value of excluded equity exposures to investment funds.
Excluded Equity Exposures – Hedge Pair Equity Exposures	8	In line 8, column A, report the sum of the adjusted carrying values of each equity exposure in a hedge pair with the smaller adjusted carrying value.
Effective Portion of Hedge Pair Equity Exposures – 100% Risk Weight	9	In line 9, column A, report the effective portion of each hedge pair. In line 9, column B, report the amount contained in line 9, column A.
Non-significant Equity Exposures	10	In line 10, report the adjusted carrying value of non-significant equity exposures (excluding items reported in lines 2 through 5 and 7 through 9) up to 10 percent of tier 1 plus tier 2 capital.
Publicly Traded Equity Exposures – 300% Risk Weight	11	In line 11, column A, report the aggregate adjusted carrying value of the bank's publicly traded equity exposures not included in lines 2 through 10**,** including the ineffective portion of each hedge pair. In line 11, column B, report the product of line 11, column A and 300 percent.
Non-Publicly Traded Equity Exposures – 400% Risk Weight	12	In line 12, column A, report the adjusted carrying value of the bank's equity exposures not included in line 11 that are not publicly traded. In line 12, column B, report the product of line 12, column A and 400 percent.
Total SRWA	13	In line 13, column B, report the sum of lines 2 through 6 and 9 through 12 of column B. This is the bank's risk-weighted asset amount under the SRWA.

INSTRUCTIONS FOR EQUITY EXPOSURES – SCHEDULE U (Refer to the NPR for Equity Exposure terms and definitions)		
Full Internal Models Approach Calculations		Lines 14 -18 are for banks that use the internal models approach for both publicly traded and non-publicly traded equity exposures (Full IMA).
Estimate of Potential Losses	14	In line 14, column A, report the estimate of potential losses on the bank's equity exposures excluding those reported in lines 2 through 5 and equity exposures to investment funds. In line 14, column B, report the product of line 16, column A, and 12.5.
Full IMA Floors Publicly Traded	15	In line 15, column A, report the sum of (i) the aggregate adjusted carrying values of the bank's publicly traded equity exposures that do not belong to a hedge pair, are not reported in lines 2-5, and are not equity exposures to an investment fund and (ii) the aggregate ineffective portion of all hedge pairs. In line 15, column B, report the product of line 15, column A and 200 percent.
Full IMA Floors Non-Publicly Traded	16	In line 16, column A, report the aggregate adjusted carrying values of the bank's equity exposures that are not publicly traded, not reported in lines 2-5, and are not equity exposures to an investment fund. In line 16, column B, report the product of line 16, column A and 300 percent
Full IMA Floors	17	Report the sum of line 15, column B and line 16, column B.
Actual RWA – Full IMA	18	In line 18, column B, report the sum of line 3, column B, line 4, column B, line 5, column B, line 6 column B, and the greater of line 14, column B and line 17, column B. This is the bank's risk-weighted asset amount under the full IMA.
Partial Internal Models Approach Calculation		Lines –19-22 are for banks that use the internal models approach only for publicly traded equity exposures (partial IMA).
Estimate of Potential Losses	19	In line 19, column A, report the estimate of potential losses on the bank's publicly traded equity exposures excluding those reported in lines 3 through 5 and equity exposures to investment funds. In line 19, column B, report the product of line 19, column A, and 12.5.

INSTRUCTIONS FOR EQUITY EXPOSURES – SCHEDULE U (Refer to the NPR for Equity Exposure terms and definitions)		
Partial IMA Floor	20	In line 20, column A, report the sum of (i) the aggregate adjusted carrying values of the bank's publicly traded equity exposures that do not belong to a hedge pair, are not reported in lines 2-5, and are not equity exposures to an investment fund and (ii) the aggregate ineffective portion of all hedge pairs. In line 20, column B, report the product of line 20, column A and 200 percent
Non-Publicly Traded Equity Exposures – 400% Risk Weight	21	In line 21, column A, report the adjusted carrying value of non-publicly traded equity exposures (other than those reported on lines 2-6). In line 21, column B, report the product of line 21, column A, and 400 percent.
Actual RWA – Partial IMA	22	In line 22, column B, report the sum of line 3, column B, line 4, column B, line 5, column B, line 6, column B, line 21, column B and the greater of line 19, column B and line 20, column B. This is the bank's risk-weighted asset amount under the partial IMA.

Preparation Instructions for Operational Risk (Schedule V)

Item No. Caption and Instructions

<u>Public</u>

Operational Risk Capital

1. Risk-based Capital Requirement for Operational Risk

   The NPR describes the risk-based capital requirement for operational risk as follows:

   If a bank does not qualify to use or does not have qualifying operational risk mitigants, the bank's dollar risk-based capital requirement for operational risk is its operational risk exposure minus eligible operational risk offsets (if any).

   If a bank qualifies to use operational risk mitigants and has qualifying operational risk mitigants, the bank's dollar risk-based capital requirement for operational risk is the greater of:

   (1) The bank's operational risk exposure adjusted for qualifying operational risk mitigants minus eligible operational risk offsets (if any); or

   (2) 0.8 multiplied by the difference between: (i) The bank's operational risk exposure; and (ii) Eligible operational risk offsets (if any).

2. Is item 1 generated from an "alternative operational risk quantification system?"

   Indication (y/n) of whether the risk-based capital figure reported in item 1 results from an "alternative operational risk quantification system" as discussed in section 22(h)(3)(ii) of the NPR.

   <u>Expected Operational Loss (EOL) and Eligible Operational Risk Offsets</u>

3. Expected Operational Loss (EOL)

   As defined in the NPR, EOL is the expected value of the distribution of potential aggregate operational losses, as generated by the bank's operational risk quantification system using a one-year horizon.

4. Total Eligible Operational Risk Offsets

   Summary: As defined in the NPR, eligible operational risk offsets are amounts, not to exceed expected operational loss, that: (1) are generated by internal business practices to absorb highly predictable and reasonably stable operational losses, including reserves calculated consistent with GAAP; and (2) are available to cover expected operational losses with a high degree of certainty over a one-year horizon.

   a. Eligible GAAP reserves: Reserves calculated in a manner consistent with GAAP as described above.

   b. Other eligible offsets: Offsets approved by the institution's supervisor outside of GAAP reserves reported in item 4.a. above.

Total Risk-based Capital Requirement for Operational Risk without:

Summary: The effects of each of the following three adjustments on risk-based capital for operational risk should be calculated independently (e.g. item 7 should only exclude Risk Mitigants from the calculation, and should continue to include adjustments for dependence assumptions and those related to business environment and internal control factors).

5. Dependence Assumptions: This amount is equal to the risk-based capital for operational risk excluding the effects of dependence assumptions. As defined in the NPR, dependence is a measure of the association among operational losses across and within business lines and operational loss event types.

6. Adjustments Reflecting Business Environment and Internal Control Factors: This amount is equal to the risk-based capital for operational risk excluding the effects of qualitative adjustments that account for key business environment and internal control factors.

7. Risk Mitigants (e.g., insurance): This amount is equal to the risk-based capital requirement for operational risk excluding the effects of risk mitigants, as described in section 61(b) of the NPR.

Confidential

Internal Operational Loss Data Characteristics

8. Reporting dates

   a. Starting date: The beginning date of the time period of internal loss data used in modeling operational risk capital.

b. Ending date: The ending date of the time period of internal loss data used in modeling operational risk capital.

9. Highest dollar threshold on loss data

The highest dollar amount that is used to exclude internal operational loss data from operational risk capital modeling.

10. Does the dollar threshold change across units of measure?

Indication (y/n) of whether the thresholds for the internal loss data used in modeling operational risk capital differ across units of measure. As defined in the NPR, unit of measure is the level (for example, organizational unit or operational loss event type) at which the bank's operational risk quantification system generates a separate distribution of potential operational losses.

11. Total number of losses:

Column A: The total number of internal losses used in the model to determine the risk-based capital requirement for operational risk.

Column B: The total number of internal losses in the current reporting period.

12. Total dollar amount of losses:

Column A: The total dollar amount of internal losses used in the model to determine the risk-based capital requirement for operational risk.

Column B: The total dollar amount of internal losses in the current reporting period.

13. Dollar amount of largest loss:

Column A: The dollar value of the largest single loss used in the model to determine the risk-based capital requirement for operational risk.

Column B: The dollar value of the largest single loss in the current reporting period.

14. Number of losses in the following ranges (e.g., ≥ $10,000 and < $100,000):

    For the ranges specified in a. through e. below, report the number of losses greater than or equal to the low-end of the range and less than the high-end of the range. For f., report the number of losses greater than or equal to $1 Billion.

    a. $10,000 - $100,000
    b. $100,000 - $1 Million
    c. $1 Million - $10 Million
    d. $10 Million - $100 Million
    e. $100 Million - $1 Billion
    f. $1 Billion+

    Column A: For each range, the total number of internal losses used in the model to determine the risk-based capital requirement for operational risk.

    Column B: For each range, the total number of internal losses in the current reporting period.

15. Total dollar amount of losses in the following ranges (e.g., ≥ $10,000 and < $100,000):

    For the ranges specified in a. through e. below, report the dollar amount of losses greater than or equal to the low-end of the range and less than the high-end of the range. For f., report the dollar amount of losses greater than or equal to $1 Billion.

    a. $10,000 - $100,000
    b. $100,000 - $1 Million
    c. $1 Million - $10 Million
    d. $10 Million - $100 Million
    e. $100 Million - $1 Billion
    f. $1 Billion+

    Column A: For each range, the total dollar amount of internal losses used in the model to determine the risk-based capital requirement for operational risk.

    Column B: For each range, the total dollar amount of internal losses in the current reporting period.

Scenario Analysis

16. How many individual scenarios were used in calculating the risk-based capital requirement for operational risk?

    The total number of scenarios used in the model to determine the risk-based capital requirement for operational risk.

17. What is the dollar value of the largest individual scenario?

    The dollar value of the largest scenario used in the model to determine the risk-based capital requirement for operational risk.

18. Number of scenarios in the following ranges (e.g., ≥ $1 Million and < $10 Million):

    For the ranges specified in a. through d. below, report the number of scenarios greater than or equal to the low-end of the range and less than the high-end of the range. For e., report the number of scenarios greater than or equal to $1 Billion.

    a. $1 Million - $10 Million
    b. $10 Million - $100 Million
    c. $100 Million - $500 Million
    d. $500 Million - $1 Billion
    e. $1 Billion +

Distributional Assumptions

19. How many units of measure were used in calculating the risk-based capital requirement for operational risk?

    The number of units of measure for which a separate distribution of potential operational losses is generated by the institution’s operational risk quantification system.

20. **Frequency Distribution**: Across how many individual units of measure did the choice of frequency distribution change since the last reporting period?

    The total number of units of measure for which the statistical distribution(s) used this reporting period to estimate loss frequency differs from those used in the prior reporting period.

21. **Severity Distribution**: Across how many individual units of measure did the choice of severity distribution change since the last reporting period?

    The total number of units of measure for which the statistical distribution(s) used this reporting period to estimate loss severity differs from those used in the prior reporting period.

Loss Caps

Summary: The use of caps to exclude losses over a certain threshold can have a significant impact on modeling operational risk exposure, and can lead to an under-estimation of the risk-based capital requirement for operational risk. Items 22 through 24 solicit information on the extent to which such loss caps are used and the levels at which those caps are set.

22. How many loss caps are used in calculating the risk-based capital requirement for operational risk?

    The number of loss caps used to limit loss size in the quantification process for determining the risk-based capital requirement for operational risk.

23. What is the dollar amount of the smallest cap used?

    The dollar amount of the smallest cap used to limit loss size in the quantification process for determining the risk-based capital requirement for operational risk.

24. What is the dollar amount of the largest cap used?

    The dollar amount of the largest cap used to limit loss size in the quantification process for determining the risk-based capital requirement