



May 07, 2004

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Ave, N.W.
Washington, DC 20551

via email to regs.comments@federalreserve.gov

Re: **Comments on Revised Format for HMDA Public Disclosures**
Regulation C; Docket No. R-1186

Dear Ms. Johnson,

Union Bank of California, N.A. ("UBOC") respectfully submits this letter in response to your request for comment on the proposed revisions to the HMDA Public Disclosures. We greatly appreciate being given the opportunity to provide our comments.

UBOC is the third-largest commercial bank, by deposits, headquartered in California and is among the 35 largest banks in the United States with assets of \$42.5 billion at year-end 2003. UBOC has more than 284 branches in California, Washington and Oregon, with offices in New York and Texas, as well as 20 international locations. Our holding company is UnionBanCal Corporation. We are a full service commercial bank providing a broad mix of financial services, including trust and investment management services, private banking, and consumer and business lending with expertise in commercial, middle market, corporate and real estate lending.

UBOC offers mortgage loans for the purposes of purchasing a home and refinancing an existing loan. We offer a wide variety of products through retail and wholesale channels, as well as providing Internet delivery. Our mortgage loan volume in 2003 was \$5.1 billion. UBOC also performs the servicing and collection functions for its mortgage loans.

We are supportive of the Board's efforts to modify the HMDA Disclosure Tables to reflect the new data being collected effective January 1, 2004, however we have one concern about footnotes to the tables. Footnotes #11 and #12 appear to be in conflict. Both footnotes describe the same set of circumstances, but the results will be tabulated in two different categories.

Footnote #11 indicates that if the applicant and co-applicant report different ethnicities, they are grouped by the ethnicity of the first person listed on the application. Footnote #12 indicates that if the applicant and co-applicant report different ethnicities they will be reported under a category labeled "Joint".

We would like to request that applications in which the applicant and co-applicant report different ethnicities be coded "Joint" according to Footnote #12. We feel that coding such applications as "Joint" more accurately reflects our lending to minorities. Further, use of a "Joint" category is consistent with the reporting of mixed applicant/co-applicant race combinations.

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We thank you for this opportunity to comment on the proposed rule and appreciate your consideration of our views. Should there be any questions, or if further information is needed, please feel free to contact me at (415) 291-4780.

Sincerely,
UNION BANK OF CALIFORNIA, N.A.

A handwritten signature in black ink, reading "Grisel Arias Kaplan", is displayed on a light gray rectangular background.

Grisel Arias Kaplan
Senior Vice President and
Chief Compliance Officer