

From: Management Reporting & Financial Systems, Dennis J. O'Neill
Proposal: FR Y-14A and FR Y-14Q - Capital Assessments and Stress Testing (#11-18)
Subject: FRY 14A & FR Y-14Q

Comments:

To Whom it May Concern

We respectfully request that our bank not be identified with these comments.
Thank you.

Below is a summary of the comments that we would like to submit regarding the recent changes in the OCC / FR-Y 14Q CRE data file process:

1. The internal process developed within the bank to compile the OCC CRE data request would need to undergo significant programming modifications to comply with the revised definitions. There is a natural lead time in properly analyzing, designing, testing, and implementing these changes. The requirement to provide this additional information for the 9/30/11 reporting period within our current systematic process is not possible. Therefore, these new changes will require many hours of manual intervention to bypass the current process in place at the bank.
2. Existing systems will need to be evaluated to determine gaps in reporting given the new definitions and the additional data requirements.
3. There are constraints on budgeting and technology resources required to implement the changes, especially given the late time of year.
4. Regarding the Commercial Real Estate data collection, the Line Reported on FR Y-9C (field 4) relating to 6 "2746 (loans to finance CRE, but not secured by RE) is currently captured and submitted with the CRE data. Since these are normally C&I loans, are we to exclude from our Corporate Loan Data Collection submission?
5. Loans secured by farmland (HC-C 1b) are excluded from the Commercial Real Estate data collection and are not required in the Corporate Loan data collection. We currently exclude from our OCC CRE submission and are not planning on including on our Corporate Loan submission. Is this correct?

Thank you.

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