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Financial Institution Letter

FIL-41-2013
September 24, 2013

FINANCIAL INSTITUTION REPORTS

TO: CHIEF EXECUTIVE OFFICER (also of interest to Chief Financial Officer)
SUBJECT: Proposed Regulatory Capital Reporting Changes

The Federal Deposit Insurance Corporation (FDIC), the Federal Reserve Board (Board), and the Office of the Comptroller of the Currency (OCC) (collectively, the agencies), under the auspices of the Federal Financial Institutions Examination Council (FFIEC), are requesting comment on proposed revisions to:

- Schedule RC-R, Regulatory Capital, of the Consolidated Reports of Condition and Income (Call Report); and
- Risk-Based Capital Reporting for Institutions Subject to the Advanced Capital Adequacy Framework (FFIEC 101). This report is completed only by advanced approaches institutions. In general, an advanced approaches institution has consolidated total assets of \$250 billion or more or consolidated total on-balance sheet foreign exposure of \$10 billion or more, or is a subsidiary of a depository institution or holding company that is an advanced approaches institution.

The proposed changes to these reports, which are described in the attached Federal Register notice, are consistent with the revised regulatory capital rules approved by the agencies during July 2013. The FFIEC and the agencies encourage you to review the proposal and comment on those aspects of interest to you. You may send comments to any or all of the agencies by the methods identified in the *Federal Register* notice. All comments must be submitted by October 11, 2013. The FFIEC and the agencies will review and consider all comments as they finalize the revisions to the Call Report and the FFIEC 101.

At present, Call Report Schedule RC-R collects data on tier 1, tier 2, and total capital and regulatory capital ratios (the regulatory capital components and ratios portion of the schedule) and risk-weighted assets (the risk-weighted assets portion of the schedule). The agencies' proposal would align the regulatory capital components and ratios portion of Schedule RC-R with the revised regulatory capital rules and, compared to the current version of the schedule, provide a more detailed breakdown of the components of regulatory capital, including deductions and adjustments. As proposed by the agencies, the following changes would be made to the regulatory capital components and ratios portion of Schedule RC-R:

- Existing items 1 through 33 of Schedule RC-R would be designated Part I.A, Regulatory Capital Components and Ratios, in March 2014. All institutions except advanced approaches institutions would complete Part I.A in their Call Reports for March 31 through December 31, 2014. No changes are proposed to Part I.A for 2014.

- A new Part I.B, Regulatory Capital Components and Ratios, would be added to Schedule RC-R in March 2014. Advanced approaches institutions would complete Part I.B in their Call Reports for March 31 through December 31, 2014.
- Effective March 31, 2015, Part I.A would be removed from Schedule RC-R and Part I.B would be designated Part I, Regulatory Capital Components and Ratios. All institutions would then complete Part I of Schedule RC-R.

In addition, existing items 34 through 62 and Memorandum items 1 and 2 of Schedule RC-R would be designated Part II, Risk-Weighted Assets, in March 2014. All institutions would complete Part II in their Call Reports for March 31 through December 31, 2014. No changes are proposed to Part II for 2014. However, the agencies expect to request comment at a later date on a separate proposal to replace the existing risk-weighted assets portion of Schedule RC-R in March 2015 with a revised version of Part II that would incorporate the standardized approach for calculating risk-weighted assets under the revised regulatory capital rules. The revised version of Part II would be completed by all institutions beginning with the Call Report for March 31, 2015.

The proposed changes to the FFIEC 101, which is completed only by advanced approaches institutions, would take effect March 31, 2014. Schedule A, Advanced Risk-Based Capital, of the FFIEC 101 would be revised to incorporate the common disclosure template adopted by the Basel Committee on Banking Supervision in June 2012, with minor changes for consistency with the revised regulatory capital rules and U.S. accounting terminology. The proposed revised Schedule A also includes additional line items, such as the supplementary leverage ratio, to collect data on the new requirements established by the revised regulatory capital rules. The agencies also are proposing to revise nine of the risk weighted assets schedules in the FFIEC 101 to facilitate the timely implementation of the revised advanced approaches rules in 2014.

To help you understand the proposed changes to the regulatory capital components and ratios portion of Call Report Schedule RC-R and the FFIEC 101, drafts of proposed Part I.B of Schedule RC-R and the revised FFIEC 101 as well as the related instructions are available on the FFIEC's Web site (www.ffiec.gov/ffiec_report_forms.htm) and, for the Call Report only, on the FDIC's Web site (<http://www.fdic.gov/callreports>).

Please forward this letter to the person responsible for preparing the Call Report and, if applicable, the FFIEC 101 at your institution. For further information about the proposed reporting revisions, state member banks should contact their Federal Reserve District Bank; national banks and federal savings associations should contact the OCC's Office of the Chief Accountant in Washington, D.C., by telephone at (202) 649-6994 or by e-mail at callreportstaskforce@occ.treas.gov; and FDIC-supervised banks and savings associations should contact the FDIC's Data Collection and Analysis Section in Washington, D.C., by telephone at (800) 688 FDIC (3342) or by e-mail at research@fdic.gov.

Judith E. Dupre'
Executive Secretary

Attachment - PDF ([PDF Help](#))

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