Financial Institution Letter FIL-93-97 September 30, 1997

OPTIONAL REGULATORY CAPITAL WORKSHEET WORKSHEET PART 1.

Schedule Item # Amount			Item Name/Comments		
CALCULATION OF ELIGIBLE TIER 1 CAPITAL					
Compone	ents of Tier 1 Capital:				
1. RC	24 plus 25		Common stock and surplus		
2. RC	26.a plus 27		Undivided profits and F/X translation adjustment		
3. RC-B RC-B	6 col. C minus 6 col. D		Unrealized loss on equity securities (subtract total of items 6.a and b, column D, from total of items 6.a and b, column C; <i>however, if the amount is negative, enter zero</i>)		
4. RC-M	9		Qualifying perpetual preferred stock & related surplus		
5. RC-G	3		Qualifying minority interest in the equity accounts of consolidated subsidiaries (exclude nonqualifying portions)		
6. Line 1, lines 4 a	, plus line 2 minus line 3, plus nd 5		"Gross" Tier 1 Capital		
Adjustments to Tier 1 Capital:					
7. RC-M	6.b.(2)		LESS: All other identifiable intangible assets		
8. RC-M	6.c.		LESS: Goodwill		
9. RC-M	6.e.		PLUS: Intangible assets that have been grandfathered or are otherwise qualifying for regulatory capital purposes		
10. <i>Line</i>	6 minus lines 7 and 8 plus line 9	"Adjusted Gross" Tier 1 Capital			
11. 25% (of line 10		<i>Limitation on the amount of purchased credit card relationships (PCCRs) that may be held as an asset</i>		
12. 50%	of line 10		Limitation on the total amount of mortgage servicing assets (MSAs) and PCCRs that can be held as assets		
13. RC- M	6.b.(1)		Intangible assets: PCCRs (If 90% of the fair value of PCCRs is less than RC-M, item 6.b.(1), enter 90% of the fair value on line 13 and add the difference to line 14)		
14. <i>Line</i>	13 minus line 11		Disallowed PCCRs: <i>If line 13 minus line 11 is a negative number, enter 0; otherwise, enter the difference</i>		
15. RC- M	6.a.		Intangible assets: MSAs (If 90% of the fair value of MSAs, as reported in RC-M, item 6.a.(1), is less than RC-M, item 6.a, enter 90% of the fair value on line 15 and add the difference to line 17)		

16. Line 15 plus the lesser of line 11 or line 13		MSAs plus the qualifying portion of PCCRs			
17. Line 16 minus 12		Disallowed MSAs and PCCRs based on an aggregate limitation (<i>If line 16 minus line 12</i> <i>is a negative number, enter 0; otherwise, enter</i> <i>the difference</i>)			
18. RC-F Memo #1		Disallowed deferred tax assets			
19. Sum of lines 14, 17 and 18		Total disallowed MSAs, PCCRs and deferred tax assets ¹			
20. Line 10 minus line 19		Tier 1 Capital (report in Schedule RC-R, item 3.a)			
CALCULATION OF ELIGIBLE TIER 2 CAPITAL Components of Tier 2 Capital:					
21. RC-R 2.a		Portion of qualifying subordinated debt and			
21.101.2.4		intermediate-term preferred stock and related surplus that is includible in Tier 2 capital			
22. RC-R 2.b		Portion of other qualifying limited-life capital instruments that is includible in Tier 2 capital			
23. RC 23 minus 9 RC-M		Cumulative perpetual preferred stock			
24. RC- 7 M		Mandatory convertible debt, net of common or perpetual preferred stock dedicated to redeem the debt			
25. Sum of lines 21, 22, 23 and 24		Tier 2 capital components BEFORE the addition of qualifying allowance for loan and lease losses (ALLL) ²			
Calculation of Risk-Weighted Assets:					
26. "Gross" risk-weighted assets from Worksheet Part 2, Row 28 [or from of "gross" risk-weighted assets excluding assets deducted for capital purposes, but before deducting any excess (disqualified) ALLL and any allocated transfer risk reserve]		"Gross" Risk-Weighted Assets excluding assets deducted for capital purposes, but before deducting any excess (disqualified) allowance for loan and lease losses and any allocated transfer bank's own calculation risk reserve.			
Constraint on Allowance for Loan and Lease Losses (ALLL):					
27. 1.25% of line 26		Maximum amount of ALLL permitted in Tier 2 capital			
28. RC 4.b.		Allowance for Loan and Lease Losses (ALLL)			
29. Enter the lesser of lines 27 or 28		Amount of the ALLL allowed in Tier 2 capital			
30. Subtract line 29 from 28		Excess (disqualified) ALLL (report in Schedule RC-R, item 3.d)			
31. Add lines 25 and 29		Eligible Tier 2 capital			
32. Enter the lesser of lines 20 or 31		Tier 2 Capital (report in Schedule RC-R, item 3.b)			
33. RC- Memo 1.a (from 12-31-96 CallM Report) and from bank records		Reciprocal holdings of bank capital Instruments plus investments, both equity and debt, in unconsolidated banking and finance subsidiaries that are deemed to be capital of			

	the subsidiary, plus any other assets that must be deducted when determining total risk-based capital in accordance with the requirements of the bank's primary federal supervisory authority.			
34. Line 20 plus line 32 minus line 33	_ Total Risk-Based Capital (report in Schedule RC-R, item 3.c)			
CALCULATION OF RISK-BASED CAPITAL (RBC) RATIOS				
35. RC 4.c.	_ Allocated Transfer Risk Reserve (ATRR)			
36. Line 26 minus the sum of lines30 and 35	Risk-Weighted Assets (after deduction of all disallowed intangibles, disallowed deferred tax assets, the excess ALLL, and ATRR) [report in Schedule RC-R, item 3.e]			
37. Divide line 34 by line 36 andmultiply by 100	_% Total RBC Ratio			
38. Divide line 20 by line 36 andmultiply by 100	_% Tier 1 RBC Ratio			

¹Banks should add to this line the amount of any other assets that must be deducted when determining Tier 1 capital in accordance with the requirements of their primary federal supervisory authority.

supervisory authority. ²Banks that file FFIEC 034 may add the amount shown on RC, item 28.b., to this sum -- losses deferred pursuant to 12 U.S.C. 1823(j).