

TABLE III-A. Third Quarter 2007, All FDIC-Insured Institutions

THIRD QUARTER (The way it is...)	All Insured Institutions	Asset Size Distribution				Geographic Regions*						
		Less than \$100 Million	\$100 Million to \$1 Billion	\$1 Billion to \$10 Billion	Greater than \$10 Billion	New York	Atlanta	Chicago	Kansas City	Dallas	San Francisco	
Number of institutions reporting	8,560	3,513	4,392	539	116	1,047	1,214	1,794	1,990	1,740	775	
Commercial banks	7,303	3,131	3,673	415	84	547	1,069	1,479	1,885	1,618	705	
Savings institutions	1,257	382	719	124	32	500	145	315	105	122	70	
Total assets (in billions)	\$12,707.1	\$186.0	\$1,296.8	\$1,408.3	\$9,816.0	\$2,381.6	\$3,197.1	\$2,796.5	\$931.6	\$659.5	\$2,740.9	
Commercial banks	10,792.7	166.5	1,050.3	1,100.1	8,475.8	1,710.3	2,920.1	2,641.0	891.8	542.4	2,087.0	
Savings institutions	1,914.4	19.5	246.5	308.2	1,340.2	671.2	277.0	155.4	39.8	117.1	653.9	
Total deposits (in billions)	8,181.6	151.2	1,036.0	1,009.6	5,984.8	1,470.4	2,064.2	1,786.9	661.4	492.6	1,706.0	
Commercial banks	7,011.5	136.5	850.4	793.0	5,231.7	1,024.5	1,901.2	1,675.8	633.3	422.2	1,354.6	
Savings institutions	1,170.0	14.7	185.5	216.7	753.1	445.9	163.0	111.2	28.1	70.4	351.4	
Net income (in millions)	28,669	369	3,328	3,904	21,068	4,828	6,083	6,348	3,758	1,866	5,784	
Commercial banks	27,270	357	2,932	3,433	20,547	4,686	6,424	6,228	3,709	1,606	4,616	
Savings institutions	1,399	12	396	470	521	142	-341	120	49	260	1,168	
Performance Ratios (annualized,%)												
Yield on earning assets	6.95	7.18	7.28	7.21	6.86	6.96	6.62	6.54	7.71	7.35	7.39	
Cost of funding earning assets	3.58	3.05	3.38	3.48	3.64	3.55	3.52	3.54	3.45	3.41	3.82	
Net interest margin	3.36	4.13	3.90	3.73	3.22	3.41	3.10	3.00	4.26	3.94	3.56	
Noninterest income to assets	1.91	1.45	1.11	1.61	2.07	2.18	1.47	1.78	3.35	1.40	1.95	
Noninterest expense to assets	2.92	4.00	3.09	2.92	2.88	3.23	2.49	2.72	4.09	3.17	2.91	
Loan and lease loss provision to assets	0.53	0.23	0.25	0.35	0.60	0.63	0.39	0.38	0.58	0.28	0.83	
Net operating income to assets	0.95	0.79	1.02	1.18	0.91	0.90	0.87	0.90	1.58	1.13	0.90	
Pretax return on assets	1.35	1.04	1.37	1.68	1.31	1.21	1.18	1.32	2.45	1.52	1.29	
Return on assets	0.92	0.80	1.04	1.12	0.88	0.84	0.77	0.91	1.63	1.15	0.87	
Return on equity	8.81	5.87	9.86	9.92	8.57	6.77	7.61	10.17	16.16	11.13	8.08	
Net charge-offs to loans and leases	0.57	0.24	0.24	0.35	0.66	0.93	0.28	0.43	0.74	0.29	0.72	
Loan and lease loss provision to net charge-offs	155.45	147.01	150.43	144.22	156.84	117.69	224.79	156.68	111.67	146.13	179.52	
Efficiency ratio	58.37	75.52	65.38	57.19	57.27	57.11	59.01	60.68	56.58	63.19	56.47	
% of unprofitable institutions	10.90	17.31	6.31	5.94	13.79	15.19	16.06	10.76	6.63	7.01	17.03	
% of institutions with earnings gains	49.47	49.33	49.93	48.42	41.38	42.60	39.21	47.71	53.62	58.33	48.39	
Structural Changes												
New Charters	42	40	1	1	0	2	18	5	3	3	11	
Institutions absorbed by mergers	93	27	45	12	9	29	20	15	13	11	5	
Failed Institutions	1	0	0	1	0	0	1	0	0	0	0	
PRIOR THIRD QUARTERS (The way it was...)												
Return on assets (%)	2006	1.31	1.02	1.23	1.27	1.33	1.13	1.37	1.01	1.79	1.22	1.82
.....	2004	1.33	1.08	1.22	1.47	1.33	1.13	1.46	1.21	1.49	1.46	1.67
.....	2002	1.34	1.11	1.23	1.54	1.33	1.10	1.38	1.29	1.64	1.44	1.75
Net charge-offs to loans and leases (%)	2006	0.40	0.16	0.14	0.20	0.49	0.63	0.18	0.27	0.46	0.23	0.62
.....	2004	0.51	0.25	0.22	0.34	0.60	0.73	0.26	0.43	0.61	0.30	0.54
.....	2002	0.98	0.31	0.36	0.76	1.21	1.51	0.73	0.80	1.15	0.42	0.77

* See Table IV-A (page 9) for explanations.

TABLE IV-A. First Three Quarters 2007, All FDIC-Insured Institutions

FIRST THREE QUARTERS (The way it is...)	All Insured Institutions	Asset Concentration Groups*								
		Credit Card Banks	International Banks	Agricultural Banks	Commercial Lenders	Mortgage Lenders	Consumer Lenders	Other Specialized <\$1 Billion	All Other <\$1 Billion	All Other >\$1 Billion
Number of institutions reporting	8,560	28	4	1,634	4,739	781	120	377	820	57
Commercial banks	7,303	25	4	1,630	4,259	169	95	332	747	42
Savings institutions	1,257	3	0	4	480	612	25	45	73	15
Total assets (in billions)	\$12,707.1	\$423.6	\$2,644.0	\$157.3	\$5,055.9	\$1,454.2	\$95.8	\$40.1	\$111.4	\$2,724.9
Commercial banks	10,792.7	411.7	2,644.0	156.9	4,584.1	254.2	46.0	32.1	94.8	2,568.8
Savings institutions	1,914.4	11.8	0.0	0.4	471.8	1,199.9	49.8	8.1	16.5	156.1
Total deposits (in billions)	8,181.6	122.4	1,597.8	127.4	3,567.7	848.0	73.2	28.5	91.0	1,725.6
Commercial banks	7,011.5	120.6	1,597.8	127.1	3,265.5	113.4	32.9	23.0	78.0	1,653.2
Savings institutions	1,170.0	1.8	0.0	0.3	302.2	734.6	40.3	5.5	13.0	72.4
Net income (in millions)	100,732	11,649	16,190	1,432	39,953	7,557	962	715	860	21,416
Commercial banks	90,184	11,030	16,190	1,429	36,870	1,700	699	481	788	20,996
Savings institutions	10,549	618	0	3	3,083	5,856	263	234	73	419
Performance Ratios (annualized,%)										
Yield on earning assets	6.83	13.23	6.28	7.15	7.02	6.59	7.23	5.53	6.51	6.16
Cost of funding earning assets	3.50	4.80	3.68	3.19	3.35	3.93	2.99	2.47	2.84	3.29
Net interest margin	3.32	8.43	2.60	3.96	3.67	2.66	4.24	3.06	3.67	2.88
Noninterest income to assets	2.05	10.31	2.31	0.68	1.51	0.99	1.93	9.44	1.01	2.10
Noninterest expense to assets	2.92	8.36	2.84	2.66	2.84	2.05	2.92	8.59	3.01	2.66
Loan and lease loss provision to assets	0.41	3.10	0.45	0.15	0.27	0.38	0.91	0.08	0.11	0.22
Net operating income to assets	1.11	3.47	0.85	1.26	1.14	0.65	1.38	2.35	1.01	1.12
Pretax return on assets	1.63	5.81	1.26	1.50	1.59	1.11	2.14	3.55	1.29	1.67
Return on assets	1.11	3.74	0.87	1.25	1.08	0.73	1.40	2.39	1.04	1.11
Return on equity	10.52	15.63	11.25	11.32	10.11	7.44	13.75	12.34	9.16	10.30
Net charge-offs to loans and leases	0.50	3.90	0.65	0.19	0.28	0.29	0.98	0.29	0.17	0.35
Loan and lease loss provision to net charge-offs	132.82	108.79	155.91	123.18	137.62	188.45	118.75	119.97	117.12	118.18
Efficiency ratio	57.33	46.06	61.90	61.10	58.41	58.87	47.98	69.94	68.34	56.16
% of unprofitable institutions	10.23	10.71	0.00	2.63	12.20	13.06	8.33	24.67	5.37	5.26
% of institutions with earnings gains	49.50	57.14	75.00	57.34	50.12	30.99	44.17	43.50	51.10	49.12
Condition Ratios (%)										
Earning assets to total assets	86.82	77.67	84.04	91.57	88.28	91.46	91.71	88.48	91.79	85.07
Loss Allowance to:										
Loans and leases	1.13	3.99	1.23	1.31	1.14	0.61	1.12	1.35	1.18	0.74
Noncurrent loans and leases	104.79	216.17	117.12	127.52	113.24	45.93	179.85	142.44	126.60	77.38
Noncurrent assets plus other real estate owned to assets	0.73	1.34	0.51	0.81	0.81	1.09	0.53	0.27	0.64	0.53
Equity capital ratio	10.45	23.07	7.78	11.32	10.85	9.44	11.89	19.58	11.58	10.56
Core capital (leverage) ratio	8.14	15.18	6.23	10.46	8.45	7.87	9.53	18.01	11.21	8.10
Tier 1 risk-based capital ratio	10.22	13.53	8.19	13.85	9.64	12.82	11.46	40.05	18.41	10.83
Total risk-based capital ratio	12.75	16.33	11.93	14.92	11.84	14.48	13.04	41.13	19.55	13.37
Net loans and leases to deposits	93.09	242.65	74.20	82.47	97.76	120.12	104.10	33.82	68.72	79.64
Net loans to total assets	59.94	70.12	44.84	66.80	68.99	70.05	79.47	24.02	56.13	50.43
Domestic deposits to total assets	53.05	26.31	26.39	81.01	67.29	58.23	75.24	68.84	81.69	50.08
Structural Changes										
New Charters	131	1	0	4	32	4	0	89	1	0
Institutions absorbed by mergers	247	1	0	22	191	8	2	2	3	18
Failed Institutions	2	0	0	0	0	1	0	0	0	1
PRIOR FIRST THREE QUARTERS (The way it was...)										
Number of institutions	2006 8,743	29	4	1,691	4,710	845	125	398	886	55
	2004 9,024	35	6	1,783	4,385	1,000	136	458	1,138	83
	2002 9,415	41	5	1,877	4,081	1,159	206	453	1,495	98
Total assets (in billions)	2006 \$11,753.6	\$382.0	\$2,128.5	\$151.5	\$4,673.2	\$1,790.4	\$107.1	\$42.3	\$117.4	\$2,361.2
	2004 9,877.2	367.9	1,565.9	137.7	3,195.3	1,405.2	211.7	54.0	147.6	2,791.9
	2002 8,272.8	291.0	1,232.2	124.7	3,394.2	1,279.5	168.3	49.0	192.5	1,541.3
Return on assets (%)	2006 1.33	4.42	1.03	1.29	1.32	1.07	1.69	1.33	1.07	1.31
	2004 1.29	3.90	0.89	1.28	1.33	1.20	0.82	1.47	1.14	1.23
	2002 1.34	3.55	0.85	1.31	1.30	1.34	1.40	1.39	1.19	1.40
Net charge-offs to loans & leases (%)	2006 0.36	3.38	0.59	0.14	0.18	0.14	1.00	0.53	0.17	0.20
	2004 0.55	4.69	1.05	0.17	0.29	0.11	0.94	0.46	0.26	0.25
	2002 0.97	6.07	1.78	0.26	0.67	0.16	1.12	0.47	0.30	0.86
Noncurrent assets plus OREO to assets (%)	2006 0.50	1.35	0.40	0.67	0.51	0.52	0.65	0.20	0.52	0.37
	2004 0.57	1.30	0.69	0.77	0.55	0.59	0.63	0.30	0.63	0.40
	2002 0.92	1.61	1.28	0.93	0.88	0.68	1.34	0.36	0.70	0.80
Equity capital ratio (%)	2006 10.41	27.18	7.82	10.94	10.39	10.54	9.76	22.46	11.11	9.73
	2004 10.13	20.78	7.27	10.87	10.40	8.74	13.62	16.95	10.93	10.25
	2002 9.22	15.39	7.26	11.04	9.53	8.81	7.78	16.73	10.89	8.87

*Asset Concentration Group Definitions (Groups are hierarchical and mutually exclusive):

Credit-card Lenders - Institutions whose credit-card loans plus securitized receivables exceed 50 percent of total assets plus securitized receivables.

International Banks - Banks with assets greater than \$10 billion and more than 25 percent of total assets in foreign offices.

Agricultural Banks - Banks whose agricultural production loans plus real estate loans secured by farmland exceed 25 percent of their total loans and leases.

Commercial Lenders - Institutions whose commercial and industrial loans, plus real estate construction and development loans, plus loans

secured by commercial real estate properties exceed 25 percent of total assets.

Mortgage Lenders - Institutions whose residential mortgage loans, plus mortgage-backed securities, exceed 50 percent of total assets.

Consumer Lenders - Institutions whose residential mortgage loans, plus credit-card loans, plus other loans to individuals, exceed 50 percent of total assets.

Other Specialized < \$1 Billion - Institutions with assets less than \$1 billion, whose loans and leases are less than 40 percent of total assets.

All Other < \$1 billion - Institutions with assets less than \$1 billion that do not meet any of the definitions above, they have significant lending

activity with no identified asset concentrations.

All Other > \$1 billion - Institutions with assets greater than \$1 billion that do not meet any of the definitions above, they have significant lending

activity with no identified asset concentrations.

TABLE IV-A. First Three Quarters 2007, All FDIC-Insured Institutions

FIRST THREE QUARTERS (The way it is...)	All Insured Institutions	Asset Size Distribution				Geographic Regions*					
		Less than \$100 Million	\$100 Million to \$1 Billion	\$1 Billion to \$10 Billion	Greater than \$10 Billion	New York	Atlanta	Chicago	Kansas City	Dallas	San Francisco
Number of institutions reporting	8,560	3,513	4,392	539	116	1,047	1,214	1,794	1,990	1,740	775
Commercial banks	7,303	3,131	3,673	415	84	547	1,069	1,479	1,885	1,618	705
Savings institutions	1,257	382	719	124	32	500	145	315	105	122	70
Total assets (in billions)	\$12,707.1	\$186.0	\$1,296.8	\$1,408.3	\$9,816.0	\$2,381.6	\$3,197.1	\$2,796.5	\$931.6	\$659.5	\$2,740.9
Commercial banks	10,792.7	166.5	1,050.3	1,100.1	8,475.8	1,710.3	2,920.1	2,641.0	891.8	542.4	2,087.0
Savings institutions	1,914.4	19.5	246.5	308.2	1,340.2	671.2	277.0	155.4	39.8	117.1	653.9
Total deposits (in billions)	8,181.6	151.2	1,036.0	1,009.6	5,984.8	1,470.4	2,064.2	1,786.9	661.4	492.6	1,706.0
Commercial banks	7,011.5	136.5	850.4	793.0	5,231.7	1,024.5	1,901.2	1,675.8	633.3	422.2	1,354.6
Savings institutions	1,170.0	14.7	185.5	216.7	753.1	445.9	163.0	111.2	28.1	70.4	351.4
Net income (in millions)	100,732	1,159	10,078	11,051	78,444	16,257	24,756	20,963	10,937	5,538	22,280
Commercial banks	90,184	1,118	8,777	9,429	70,859	14,017	24,150	20,346	10,760	4,729	16,182
Savings institutions	10,549	42	1,300	1,621	7,585	2,240	606	617	178	810	6,098
Performance Ratios (annualized,%)											
Yield on earning assets	6.83	7.00	7.17	7.10	6.73	6.80	6.54	6.36	7.62	7.23	7.31
Cost of funding earning assets	3.50	2.93	3.29	3.39	3.57	3.46	3.45	3.48	3.29	3.33	3.76
Net interest margin	3.32	4.07	3.87	3.71	3.17	3.34	3.09	2.88	4.33	3.90	3.55
Noninterest income to assets	2.05	1.35	1.12	1.58	2.26	2.17	1.72	2.08	3.42	1.40	2.03
Noninterest expense to assets	2.92	3.82	3.09	2.93	2.88	3.05	2.55	2.81	4.19	3.16	2.86
Loan and lease loss provision to assets	0.41	0.18	0.20	0.31	0.45	0.56	0.24	0.28	0.61	0.22	0.58
Net operating income to assets	1.11	0.84	1.05	1.16	1.11	0.98	1.09	1.01	1.62	1.15	1.16
Pretax return on assets	1.63	1.10	1.42	1.63	1.67	1.44	1.61	1.49	2.40	1.53	1.74
Return on assets	1.11	0.85	1.06	1.08	1.12	0.97	1.07	1.02	1.63	1.16	1.16
Return on equity	10.52	6.19	10.16	9.58	10.82	7.80	10.43	11.36	15.79	11.32	10.65
Net charge-offs to loans and leases	0.50	0.18	0.18	0.35	0.59	0.87	0.25	0.37	0.66	0.23	0.64
Loan and lease loss provision to net charge-offs	132.82	164.51	155.94	130.27	131.72	112.92	154.07	139.58	129.22	150.80	140.47
Efficiency ratio	57.33	74.75	65.42	57.90	55.88	56.60	56.86	60.13	56.99	63.53	54.50
% of unprofitable institutions	10.23	16.99	5.71	3.90	6.03	15.00	15.32	9.36	5.53	7.18	16.77
% of institutions with earnings gains	49.50	49.25	50.27	46.75	40.52	38.11	43.33	45.48	53.12	58.79	53.68
Condition Ratios (%)											
Earning assets to total assets	86.82	91.95	92.02	90.80	85.46	86.35	86.23	86.88	86.03	89.99	87.34
Loss Allowance to:											
Loans and leases	1.13	1.29	1.16	1.20	1.11	1.41	0.93	1.20	1.19	1.10	1.06
Noncurrent loans and leases	104.79	115.62	111.81	113.31	102.07	128.01	119.76	97.79	81.87	112.11	92.39
Noncurrent assets plus other real estate owned to assets	0.73	0.87	0.89	0.83	0.69	0.66	0.54	0.78	1.19	0.77	0.80
Equity capital ratio	10.45	13.69	10.57	11.39	10.23	12.41	10.16	9.09	10.14	10.40	10.58
Core capital (leverage) ratio	8.14	13.53	10.07	9.58	7.56	9.01	7.26	7.37	8.26	8.88	9.01
Tier 1 risk-based capital ratio	10.22	19.65	13.36	12.16	9.38	12.20	8.97	8.87	9.64	11.87	11.48
Total risk-based capital ratio	12.75	20.70	14.47	13.43	12.29	14.15	11.42	11.80	12.28	13.25	14.35
Net loans and leases to deposits	93.09	77.06	87.23	94.80	94.23	90.38	93.86	86.34	98.07	86.29	101.63
Net loans to total assets	59.94	62.64	69.69	67.96	57.45	55.80	60.60	55.17	69.62	64.46	63.26
Domestic deposits to total assets	53.05	81.28	79.78	71.08	46.40	53.20	56.69	51.43	64.58	74.06	41.36
Structural Changes											
New Charters	131	124	5	2	0	14	40	12	7	24	34
Institutions absorbed by mergers	247	84	128	26	9	62	40	44	36	40	25
Failed Institutions	2	1	0	1	0	1	1	0	0	0	0
PRIOR FIRST THREE QUARTERS (The way it was...)											
Number of institutions	2006 8,743	3,731	4,369	523	120	1,097	1,232	1,848	2,027	1,767	772
	2004 9,024	4,204	4,223	480	117	1,136	1,223	1,968	2,104	1,840	753
	2002 9,415	4,809	4,059	441	106	1,222	1,249	2,067	2,180	1,910	787
Total assets (in billions)	2006 \$11,753.6	\$194.2	\$1,283.5	\$1,422.5	\$8,853.4	\$2,962.9	\$2,928.6	\$2,736.1	\$814.5	\$644.3	\$1,667.3
	2004 9,877.2	217.7	1,177.3	1,326.4	7,155.9	3,403.0	2,104.7	1,745.7	763.1	588.8	1,271.9
	2002 8,272.8	243.9	1,113.3	1,256.3	5,659.4	2,826.3	1,667.5	1,561.3	429.8	569.2	1,218.7
Return on assets (%)	2006 1.33	1.01	1.20	1.30	1.36	1.24	1.34	1.07	1.68	1.27	1.77
	2004 1.29	1.02	1.19	1.48	1.28	1.14	1.40	1.13	1.51	1.35	1.61
	2002 1.34	1.05	1.18	1.45	1.36	1.17	1.36	1.32	1.59	1.42	1.60
Net charge-offs to loans & leases (%)	2006 0.36	0.14	0.14	0.19	0.43	0.56	0.16	0.24	0.39	0.20	0.56
	2004 0.55	0.22	0.23	0.35	0.66	0.81	0.31	0.36	0.75	0.26	0.60
	2002 0.97	0.28	0.33	0.74	1.19	1.48	0.69	0.77	1.19	0.40	0.79
Noncurrent assets plus OREO to assets (%)	2006 0.50	0.72	0.57	0.46	0.49	0.43	0.31	0.54	0.89	0.62	0.63
	2004 0.57	0.82	0.61	0.53	0.56	0.56	0.39	0.68	0.61	0.65	0.66
	2002 0.92	0.87	0.75	0.73	1.00	1.05	0.79	1.04	0.87	0.84	0.72
Equity capital ratio (%)	2006 10.41	13.04	10.46	11.00	10.25	11.13	9.76	9.03	11.18	10.36	12.20
	2004 10.13	11.94	10.20	10.83	9.94	10.16	8.45	10.47	10.52	10.17	12.14
	2002 9.22	11.42	10.05	10.08	8.78	8.92	9.42	8.62	10.32	9.76	9.79

* Regions:
 New York - Connecticut, Delaware, District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Puerto Rico, Rhode Island, Vermont, U.S. Virgin Islands
 Atlanta - Alabama, Florida, Georgia, North Carolina, South Carolina, Virginia, West Virginia
 Chicago - Illinois, Indiana, Kentucky, Michigan, Ohio, Wisconsin
 Kansas City - Iowa, Kansas, Minnesota, Missouri, Nebraska, North Dakota, South Dakota
 Dallas - Arkansas, Colorado, Louisiana, Mississippi, New Mexico, Oklahoma, Tennessee, Texas
 San Francisco - Alaska, Arizona, California, Hawaii, Idaho, Montana, Nevada, Oregon, Pacific Islands, Utah, Washington, Wyoming

TABLE V-A. Loan Performance, All FDIC-Insured Institutions

September 30, 2007	All Insured Institutions	Asset Concentration Groups*								
		Credit Card Banks	International Banks	Agricultural Banks	Commercial Lenders	Mortgage Lenders	Consumer Lenders	Other Specialized <\$1 Billion	All Other <\$1 Billion	All Other >\$1 Billion
Percent of Loans 30-89 Days Past Due										
All loans secured by real estate	1.27	3.14	1.82	1.13	1.05	1.63	0.66	1.10	1.52	1.19
Construction and development	1.37	0.00	0.61	2.19	1.30	3.34	1.73	1.35	1.41	1.18
Nonfarm nonresidential	0.62	0.00	0.41	1.00	0.65	0.81	0.50	0.62	1.22	0.35
Multifamily residential real estate	0.43	0.00	0.07	0.88	0.53	0.26	0.06	2.21	0.96	0.36
Home equity loans	0.91	2.46	0.89	0.68	0.74	1.21	0.65	0.52	0.86	0.97
Other 1-4 family residential	1.71	5.59	2.48	1.75	1.47	1.76	0.64	1.28	1.76	1.56
Commercial and industrial loans	0.65	2.65	0.53	1.61	0.65	0.93	0.94	1.65	1.52	0.44
Loans to individuals	1.99	2.31	2.48	2.09	1.65	1.30	1.62	1.82	2.14	1.66
Credit card loans	2.42	2.31	3.36	0.98	2.06	2.09	1.26	3.54	1.08	2.14
Other loans to individuals	1.72	2.29	2.08	2.16	1.59	0.75	1.73	1.67	2.18	1.56
All other loans and leases (including farm)	0.52	0.12	0.66	0.53	0.58	0.41	0.10	0.85	0.51	0.31
Total loans and leases	1.20	2.22	1.41	1.11	0.99	1.60	1.16	1.28	1.53	1.01
Percent of Loans Noncurrent**										
All real estate loans	1.27	2.48	1.44	1.15	1.19	1.36	0.39	0.94	0.98	1.32
Construction and development	1.85	0.00	1.10	3.03	1.84	2.70	0.75	2.76	2.01	1.57
Nonfarm nonresidential	0.73	0.00	0.56	1.33	0.73	0.85	0.64	0.94	1.26	0.59
Multifamily residential real estate	0.68	0.00	0.38	1.10	0.85	0.44	0.02	1.17	1.33	0.42
Home equity loans	0.62	1.56	0.53	0.40	0.48	0.97	0.17	0.12	0.71	0.64
Other 1-4 family residential	1.57	5.71	1.91	0.90	1.48	1.45	0.51	0.72	0.80	1.81
Commercial and industrial loans	0.64	1.96	0.33	1.33	0.69	0.94	0.74	2.01	1.15	0.59
Loans to individuals	1.18	1.96	1.62	0.71	0.67	0.85	0.82	0.55	0.67	0.52
Credit card loans	1.93	1.99	2.18	0.71	1.49	1.73	1.14	1.21	0.80	1.87
Other loans to individuals	0.73	1.78	1.37	0.71	0.56	0.23	0.72	0.49	0.66	0.23
All other loans and leases (including farm)	0.44	0.03	0.61	0.64	0.39	1.01	0.04	0.38	0.61	0.27
Total loans and leases	1.08	1.85	1.05	1.02	1.01	1.33	0.62	0.95	0.93	0.96
Percent of Loans Charged-off (net, YTD)										
All real estate loans	0.16	1.55	0.29	0.06	0.14	0.17	0.09	0.06	0.06	0.11
Construction and development	0.20	0.00	0.03	0.23	0.20	0.40	0.11	0.12	0.24	0.12
Nonfarm nonresidential	0.07	0.00	0.03	0.08	0.08	0.03	0.01	0.05	0.06	0.02
Multifamily residential real estate	0.10	0.00	-0.02	0.02	0.15	0.01	0.06	0.06	0.05	0.03
Home equity loans	0.34	1.78	0.38	0.04	0.27	0.55	0.15	0.01	0.04	0.31
Other 1-4 family residential	0.14	1.04	0.32	0.08	0.14	0.13	0.06	0.06	0.06	0.07
Commercial and industrial loans	0.43	4.51	0.10	0.68	0.40	0.38	2.76	0.39	0.40	0.37
Loans to individuals	2.42	4.16	2.78	0.60	1.15	3.53	1.54	0.76	0.59	1.52
Credit card loans	4.09	4.19	3.48	2.31	3.51	7.42	3.00	4.30	1.88	3.91
Other loans to individuals	1.38	3.94	2.47	0.49	0.81	0.46	1.07	0.42	0.54	1.01
All other loans and leases (including farm)	0.18	0.00	0.06	0.00	0.30	0.41	0.05	0.98	0.00	0.20
Total loans and leases	0.50	3.90	0.65	0.19	0.28	0.29	0.98	0.29	0.17	0.35
Loans Outstanding (in billions)										
All real estate loans	\$4,700.4	\$1.8	\$473.1	\$59.2	\$2,338.6	\$965.1	\$31.7	\$6.0	\$44.5	\$780.6
Construction and development	616.4	0.0	9.5	5.8	517.5	25.0	0.9	0.5	3.0	54.3
Nonfarm nonresidential	939.6	0.0	24.7	16.1	738.8	36.6	2.0	1.7	10.4	109.3
Multifamily residential real estate	192.8	0.0	11.7	1.0	115.5	47.7	0.3	0.1	0.8	15.6
Home equity loans	591.4	1.4	92.8	1.1	209.9	102.0	11.4	0.2	1.7	171.0
Other 1-4 family residential	2,238.3	0.4	285.4	15.6	717.6	753.0	17.0	3.3	25.6	420.4
Commercial and industrial loans	1,389.5	33.0	306.7	14.9	723.3	18.9	3.6	1.2	6.4	281.5
Loans to individuals	1,013.3	255.6	214.4	6.7	270.6	36.0	40.1	1.8	7.8	180.3
Credit card loans	384.5	226.4	66.7	0.4	34.5	14.8	9.4	0.1	0.3	31.9
Other loans to individuals	628.8	29.2	147.7	6.3	236.0	21.3	30.7	1.6	7.6	148.4
All other loans and leases (including farm)	602.5	19.0	206.7	25.6	196.9	5.0	1.7	0.8	4.6	142.2
Total loans and leases	7,705.8	309.3	1,200.9	106.5	3,529.4	1,024.9	77.1	9.8	63.3	1,384.6
Memo: Other Real Estate Owned (in millions)										
All other real estate owned	9,804.8	-15.1	891.1	187.5	5,153.3	2,174.7	23.7	13.3	126.3	1,250.0
Construction and development	1,489.0	0.0	0.0	53.3	1,277.6	107.1	0.8	0.9	17.6	31.7
Nonfarm nonresidential	1,362.2	0.0	6.0	60.3	1,096.5	69.6	5.2	8.0	47.3	69.2
Multifamily residential real estate	318.7	0.0	0.0	3.6	275.0	14.7	0.2	0.0	8.9	16.4
1-4 family residential	5,342.2	1.0	397.1	45.1	2,218.9	1,965.0	17.5	4.4	48.6	644.6
Farmland	67.8	0.0	0.0	25.0	38.3	0.2	0.1	0.0	3.7	0.6

* See Table IV-A (page 8) for explanations.

** Noncurrent loan rates represent the percentage of loans in each category that are past due 90 days or more or that are in nonaccrual status.

TABLE V-A. Loan Performance, All FDIC-Insured Institutions

September 30, 2007	All Insured Institutions	Asset Size Distribution				Geographic Regions*					
		Less than \$100 Million	\$100 Million to \$1 Billion	\$1 Billion to \$10 Billion	Greater than \$10 Billion	New York	Atlanta	Chicago	Kansas City	Dallas	San Francisco
Percent of Loans 30-89 Days Past Due											
All loans secured by real estate	1.27	1.44	1.09	0.87	1.40	0.96	1.16	1.40	1.07	1.25	1.62
Construction and development	1.37	1.41	1.44	1.18	1.44	1.39	1.14	1.87	1.60	0.99	1.38
Nonfarm nonresidential	0.62	1.14	0.82	0.56	0.52	0.69	0.48	0.87	0.68	0.72	0.34
Multifamily residential real estate	0.43	0.84	0.73	0.53	0.32	0.27	0.34	1.00	0.77	0.88	0.24
Home equity loans	0.91	0.86	0.83	0.70	0.94	0.70	0.99	0.80	1.03	0.62	1.04
Other 1-4 family residential	1.71	1.95	1.27	1.07	1.85	1.10	1.54	1.85	1.25	2.16	2.31
Commercial and industrial loans	0.65	1.50	1.15	0.86	0.55	0.94	0.35	0.71	0.98	0.82	0.55
Loans to individuals	1.99	2.47	1.76	1.99	2.00	2.09	1.70	1.71	2.15	1.53	2.28
Credit card loans	2.42	1.89	2.32	2.23	2.44	2.26	2.76	2.06	2.21	1.20	2.95
Other loans to individuals	1.72	2.47	1.72	1.86	1.70	1.82	1.57	1.59	2.11	1.60	1.83
All other loans and leases (including farm)	0.52	0.63	0.48	0.58	0.52	0.98	0.25	0.82	0.50	0.74	0.13
Total loans and leases	1.20	1.44	1.11	0.95	1.25	1.19	1.00	1.22	1.16	1.18	1.42
Percent of Loans Noncurrent**											
All real estate loans	1.27	1.14	1.09	1.17	1.33	1.02	0.93	1.68	1.99	1.12	1.29
Construction and development	1.85	1.72	2.11	1.88	1.71	2.35	1.58	2.50	1.96	1.22	1.71
Nonfarm nonresidential	0.73	1.21	0.85	0.72	0.66	1.01	0.47	1.09	0.79	0.66	0.36
Multifamily residential real estate	0.68	0.91	0.99	1.21	0.44	0.36	0.59	2.08	0.72	1.35	0.29
Home equity loans	0.62	0.60	0.49	0.50	0.63	0.46	0.70	0.57	0.59	0.25	0.71
Other 1-4 family residential	1.57	1.04	0.83	1.29	1.71	0.97	1.01	2.21	3.73	1.65	1.70
Commercial and industrial loans	0.64	1.42	1.09	0.77	0.56	1.18	0.42	0.60	0.82	0.72	0.47
Loans to individuals	1.18	0.90	0.57	0.88	1.25	1.56	0.72	0.81	0.94	0.54	1.55
Credit card loans	1.93	0.91	1.19	1.73	1.95	2.10	1.98	1.58	1.64	1.01	1.98
Other loans to individuals	0.73	0.90	0.52	0.43	0.77	0.69	0.56	0.55	0.40	0.44	1.25
All other loans and leases (including farm)	0.44	0.72	0.55	0.39	0.43	0.18	0.25	0.54	0.30	0.68	0.78
Total loans and leases	1.08	1.11	1.04	1.06	1.09	1.10	0.78	1.23	1.45	0.98	1.14
Percent of Loans Charged-off (net, YTD)											
All real estate loans	0.16	0.08	0.09	0.14	0.18	0.07	0.13	0.25	0.19	0.10	0.19
Construction and development	0.20	0.19	0.19	0.22	0.19	0.19	0.20	0.28	0.18	0.14	0.13
Nonfarm nonresidential	0.07	0.07	0.06	0.09	0.06	0.06	0.05	0.12	0.04	0.06	0.06
Multifamily residential real estate	0.10	0.12	0.11	0.31	0.02	0.01	0.30	0.24	0.02	0.19	0.02
Home equity loans	0.34	0.13	0.10	0.22	0.37	0.18	0.31	0.34	0.50	0.20	0.43
Other 1-4 family residential	0.14	0.08	0.08	0.08	0.16	0.06	0.08	0.28	0.15	0.07	0.20
Commercial and industrial loans	0.43	0.47	0.40	0.51	0.42	0.93	0.25	0.27	0.84	0.30	0.36
Loans to individuals	2.42	0.52	0.91	2.03	2.57	3.28	1.13	1.42	2.67	1.06	3.25
Credit card loans	4.09	2.80	5.17	3.67	4.11	4.23	3.92	3.34	3.88	2.73	4.42
Other loans to individuals	1.38	0.48	0.59	1.23	1.48	1.64	0.72	0.75	1.61	0.67	2.52
All other loans and leases (including farm)	0.18	0.15	0.20	0.31	0.17	0.22	0.28	0.13	0.11	0.37	0.10
Total loans and leases	0.50	0.18	0.18	0.35	0.59	0.87	0.25	0.37	0.66	0.23	0.64
Loans Outstanding (in billions)											
All real estate loans	\$4,700.4	\$78.9	\$708.7	\$704.7	\$3,208.1	\$791.7	\$1,295.1	\$881.4	\$375.1	\$298.7	\$1,058.3
Construction and development	616.4	11.0	145.8	162.5	297.0	63.2	202.0	125.7	50.4	79.6	95.5
Nonfarm nonresidential	939.6	22.1	239.8	228.1	449.6	175.0	245.4	200.1	85.2	89.1	144.8
Multifamily residential real estate	192.8	1.8	27.0	40.9	123.0	46.1	28.1	29.9	8.7	6.4	73.6
Home equity loans	591.4	2.5	33.1	41.2	514.4	57.5	184.8	151.6	74.1	19.7	103.6
Other 1-4 family residential	2,238.3	32.0	236.3	218.8	1,751.2	445.8	615.5	358.0	138.9	94.0	586.1
Commercial and industrial loans	1,389.5	17.0	120.3	150.7	1,101.5	196.2	331.9	350.8	117.5	74.1	319.0
Loans to individuals	1,013.3	9.3	49.7	78.1	876.3	272.3	179.6	171.6	96.5	39.6	253.7
Credit card loans	384.5	0.1	3.6	27.1	353.7	168.9	20.7	43.7	42.2	7.2	101.8
Other loans to individuals	628.8	9.1	46.1	50.9	522.6	103.4	158.9	127.8	54.3	32.4	152.0
All other loans and leases (including farm)	602.5	12.9	36.2	35.8	517.6	88.0	149.4	157.9	67.3	17.5	122.3
Total loans and leases	7,705.8	118.1	914.8	969.4	5,703.5	1,348.2	1,956.0	1,561.7	656.5	430.0	1,753.4
Memo: Other Real Estate Owned (in millions)											
All other real estate owned	9,804.8	306.4	2,057.5	1,400.4	6,040.5	791.3	2,198.4	2,433.1	1,510.9	891.8	1,979.3
Construction and development	1,489.0	48.5	688.5	480.2	271.8	143.0	490.7	256.9	225.1	265.7	107.5
Nonfarm nonresidential	1,362.2	99.3	622.5	285.1	355.3	156.2	319.2	363.9	217.3	241.2	64.4
Multifamily residential real estate	318.7	10.3	72.1	91.7	144.6	27.1	148.6	83.3	15.0	25.4	19.3
1-4 family residential	5,342.2	135.5	636.7	532.1	4,037.8	439.5	1,191.9	1,187.6	553.8	306.5	1,663.0
Farmland	67.8	12.7	34.1	8.6	12.5	12.7	5.1	5.0	11.5	31.8	1.7

* See Table IV-A (page 9) for explanations.

** Noncurrent loan rates represent the percentage of loans in each category that are past due 90 days or more or that are in nonaccrual status.

TABLE VI-A. Derivatives, All FDIC-Insured Commercial Banks and State-Chartered Savings Banks

(dollar figures in millions; notional amounts unless otherwise indicated)	3rd Quarter 2007	2nd Quarter 2007	1st Quarter 2007	4th Quarter 2006	3rd Quarter 2006	%Change 06:3-07:3	Asset Size Distribution						
							Less than \$100 Million	\$100 Million to \$1 Billion	\$1 Billion to \$10 Billion	Greater than \$10 Billion			
ALL DERIVATIVE HOLDERS													
Number of institutions reporting derivatives	1,025	1,058	1,056	1,014	1,014	1.1	66	618	262	79			
Total assets of institutions reporting derivatives	\$9,460,401	\$9,147,069	\$8,872,062	\$8,834,491	\$8,411,745	12.5	\$4,813	\$269,166	\$804,948	\$8,381,474			
Total deposits of institutions reporting derivatives	6,031,943	5,900,334	5,750,636	5,751,266	5,431,479	11.1	3,788	212,908	580,996	5,234,251			
Total derivatives	173,374,162	153,825,754	144,243,311	132,182,732	127,107,293	36.4	128	18,050	193,153	173,162,830			
Derivative Contracts by Underlying Risk Exposure													
Interest rate	138,789,184	123,340,590	116,751,419	107,434,665	103,199,181	34.5	117	17,477	86,265	138,685,325			
Foreign exchange*	16,696,567	15,117,713	14,167,853	12,564,160	12,226,802	36.6	0	125	5,808	16,690,633			
Equity	2,873,509	2,638,709	2,317,769	2,270,942	2,218,658	29.5	12	228	100,716	2,772,553			
Commodity & other (excluding credit derivatives)	1,025,685	951,725	840,505	893,310	1,558,264	-34.2	0	2	141	1,025,543			
Credit	13,989,217	11,777,017	10,165,765	9,019,655	7,904,389	77.0	0	218	223	13,988,776			
Total	173,374,162	153,825,754	144,243,311	132,182,732	127,107,293	36.4	128	18,050	193,153	173,162,830			
Derivative Contracts by Transaction Type													
Swaps	111,410,085	95,320,189	88,006,970	81,339,865	77,556,008	43.7	58	9,948	62,861	111,337,218			
Futures & forwards	17,202,716	16,198,682	15,307,492	14,881,758	14,482,709	18.8	23	1,772	17,641	17,183,280			
Purchased options	14,652,412	14,377,620	14,816,440	12,944,893	13,301,484	10.2	5	3,730	106,954	14,541,723			
Written options	15,033,435	14,842,430	14,667,326	13,332,489	12,945,812	16.1	41	2,272	4,825	15,026,296			
Total	158,298,648	140,738,921	132,798,228	122,499,005	118,286,013	33.8	128	17,723	192,280	158,088,517			
Fair Value of Derivative Contracts													
Interest rate contracts	30,717	20,025	24,447	23,299	22,720	35.2	0	21	106	30,590			
Foreign exchange contracts	3,119	5,661	74,088	5,324	4,144	-24.7	0	0	-19	3,138			
Equity contracts	-20,872	-24,713	-18,845	-17,845	-13,526	54.3	1	11	37	-20,921			
Commodity & other (excluding credit derivatives)	1,664	1,946	22,530	2,658	2,562	-35.1	0	0	0	1,664			
Credit derivatives as guarantor	-104,120	-22,960	9,032	31,583	14,670	N/M	0	0	-8	-104,112			
Credit derivatives as beneficiary	110,905	23,824	-9,668	-32,745	-14,819	N/M	0	0	6	110,899			
Derivative Contracts by Maturity**													
Interest rate contracts													
< 1 year	48,916,897	39,403,802	32,457,725	29,551,704	26,615,376	83.8	19	2,308	25,896	48,888,674			
1-5 years	36,310,944	33,846,133	33,802,189	31,385,640	30,872,442	17.6	17	10,078	25,894	36,274,955			
> 5 years	27,875,202	24,588,177	24,684,533	23,273,618	22,518,236	23.8	41	2,694	28,253	27,844,214			
Foreign exchange contracts													
< 1 year	10,094,603	8,948,450	8,372,488	7,690,210	6,687,566	50.9	0	9	4,307	10,090,288			
1-5 years	1,831,220	1,667,700	1,571,241	1,415,846	1,573,062	16.4	0	4	17	1,831,200			
> 5 years	718,390	676,071	624,415	592,897	767,427	-6.4	0	3	10	718,377			
Equity contracts	464,820	442,652	397,237	341,346	333,262	39.5	1	20	153	464,647			
< 1 year	330,227	283,520	236,563	220,856	296,151	11.5	5	91	410	329,722			
1-5 years	95,900	62,916	74,332	44,858	53,988	77.6	0	0	37	95,863			
> 5 years	278,442	280,133	271,647	235,107	496,634	-43.9	0	0	101	278,341			
Commodity & other contracts													
< 1 year	308,298	261,410	200,458	272,314	274,378	12.4	0	1	29	308,267			
1-5 years	27,617	27,273	23,931	21,581	14,486	90.6	0	0	0	27,617			
> 5 years													
Risk-Based Capital: Credit Equivalent Amount													
Total current exposure to tier 1 capital (%)	38.0	30.7	28.3	29.2	28.6		0.4	0.2	1.4	44.2			
Total potential future exposure to tier 1 capital (%)	115.1	113.4	106.8	97.7	99.0		0.2	0.4	0.9	134.1			
Total exposure (credit equivalent amount) to tier 1 capital (%)	153.1	144.1	135.1	126.9	127.6		0.6	0.6	2.3	178.3			
Credit losses on derivatives***	126.0	6.0	-3.0	-25.0	-19.0	N/M	0.0	2.0	0.0	124.0			
HELD FOR TRADING													
Number of institutions reporting derivatives	158	167	155	147	147	7.5	7	44	54	53			
Total assets of institutions reporting derivatives	7,977,228	7,783,774	7,387,988	7,223,405	6,927,469	15.2	487	19,956	239,558	7,717,226			
Total deposits of institutions reporting derivatives	5,082,751	4,923,927	4,770,607	4,712,089	4,435,616	14.6	379	15,964	165,978	4,900,430			
Derivative Contracts by Underlying Risk Exposure													
Interest rate	136,068,933	120,820,776	114,003,892	104,692,154	100,300,237	35.7	8	239	29,179	136,039,507			
Foreign exchange	15,489,462	13,683,371	12,769,131	11,788,161	11,207,226	38.2	0	12	4,860	15,484,590			
Equity	2,767,663	2,622,872	2,313,326	2,266,778	2,214,881	25.0	0	3	416	2,767,244			
Commodity & other	1,024,998	951,236	840,237	893,087	1,558,095	-34.2	0	0	90	1,024,907			
Total	155,351,056	138,078,255	129,926,585	119,640,180	115,280,439	34.8	8	254	34,546	155,316,248			
Trading Revenues: Cash & Derivative Instruments													
Interest rate	1,166	2,969	2,405	1,151	546	113.6	0	0	3	1,163			
Foreign exchange	2,005	1,264	1,831	1,613	1,355	48.0	0	0	9	1,997			
Equity	-92	1,020	1,732	1,214	1,827	-105.0	0	0	0	-92			
Commodity & other (including credit derivatives)	-757	877	1,053	-111	789	-195.9	0	0	-1	-756			
Total trading revenues	2,322	6,130	7,021	3,866	4,517	-48.6	0	0	11	2,311			
Share of Revenue													
Trading revenues to gross revenues (%)	1.6	3.9	4.9	3.0	3.4		0.0	0.0	0.2	1.6			
Trading revenues to net operating revenues (%)	13.0	25.8	33.0	19.6	20.7		0.0	-0.1	1.9	13.4			
HELD FOR PURPOSES OTHER THAN TRADING													
Number of institutions reporting derivatives	949	972	970	935	934	1.6	60	575	238	76			
Total assets of institutions reporting derivatives	9,300,602	8,967,425	8,637,855	8,604,877	8,227,057	13.0	4,377	249,131	735,782	8,311,312			
Total deposits of institutions reporting derivatives	5,923,394	5,776,744	5,582,956	5,589,964	5,305,613	11.6	3,450	196,827	533,703	5,189,414			
Derivative Contracts by Underlying Risk Exposure													
Interest rate	2,720,251	2,519,814	2,747,527	2,742,511	2,898,943	-6.2	108	17,238	57,086	2,645,819			
Foreign exchange	120,808	124,526	119,405	111,928	102,685	17.6	0	4	298	120,506			
Equity	105,846	15,837	4,443	4,164	3,777	N/M	12	226	100,300	5,309			
Commodity & other	687	489	268	223	169	306.5	0	2	51	635			
Total notional amount	2,947,592	2,660,666	2,871,643	2,858,826	3,005,575	-1.9	120	17,469	157,734	2,772,269			

All line items are reported on a quarterly basis.

*Include spot foreign exchange contracts. All other references to foreign exchange contracts in which notional values or fair values are reported exclude spot foreign exchange contracts.

** Derivative contracts subject to the risk-based capital requirements for derivatives.

*** The reporting of credit losses on derivatives is applicable to all banks filing the FFIEC 031 report form and to those banks filing the FFIEC 041 report form that have \$300 million or more in total assets.

TABLE VII-A. Servicing, Securitization, and Asset Sales Activities (All FDIC-Insured Commercial Banks and State-Chartered Savings Banks)

(dollar figures in millions)	3rd Quarter 2007	2nd Quarter 2007	1st Quarter 2007	4th Quarter 2006	3rd Quarter 2006	%Change 06:3-07:3	Asset Size Distribution			
							Less than \$100 Million	\$100 Million to \$1 Billion	\$1 Billion to \$10 Billion	Greater than \$10 Billion
Assets Securitized and Sold with Servicing Retained or with Recourse or Other Seller-Provided Credit Enhancements										
Number of institutions reporting securitization activities	123	126	126	123	119	3.4	13	48	23	39
Outstanding Principal Balance by Asset Type										
1-4 family residential loans	\$1,105,601	\$1,115,865	\$1,079,930	\$739,041	\$453,900	143.6	\$61	\$292	\$10,190	\$1,095,059
Home equity loans	9,894	10,640	9,339	8,905	9,257	6.9	0	0	248	9,646
Credit card receivables	379,662	372,481	367,796	362,467	422,983	-10.2	0	3,328	11,204	365,130
Auto loans	10,433	12,547	14,132	16,263	16,781	-37.8	0	0	332	10,101
Other consumer loans	29,386	27,396	27,737	28,673	25,753	14.1	0	7	0	29,379
Commercial and industrial loans	15,862	13,193	12,039	10,543	8,404	88.7	0	30	4,984	10,849
All other loans, leases, and other assets*	184,941	162,434	150,404	144,582	135,982	36.0	1	77	799	184,065
Total securitized and sold	1,735,779	1,714,556	1,661,376	1,310,475	1,073,059	61.8	62	3,733	27,756	1,704,229
Maximum Credit Exposure by Asset Type										
1-4 family residential loans	6,858	6,511	6,047	6,627	4,619	48.5	20	5	44	6,788
Home equity loans	2,336	2,420	2,368	2,332	2,358	-0.9	0	0	9	2,327
Credit card receivables	19,120	18,711	17,685	19,182	25,084	-23.8	0	186	526	18,408
Auto loans	426	555	628	724	813	-47.6	0	0	15	411
Other consumer loans	2,114	1,768	1,861	1,882	1,653	27.9	0	0	0	2,114
Commercial and industrial loans	399	314	311	348	407	-2.0	0	0	83	316
All other loans, leases, and other assets	4,578	1,053	1,052	964	740	518.6	1	26	46	4,505
Total credit exposure	35,831	31,331	29,952	32,059	35,674	0.4	21	218	724	34,869
Total unused liquidity commitments provided to institution's own securitizations	5,095	5,667	6,116	6,503	6,970	-26.9	0	0	0	5,095
Securitized Loans, Leases, and Other Assets 30-89 Days Past Due (%)										
1-4 family residential loans	2.7	2.5	2.1	3.0	2.4		0.1	0.0	8.8	2.7
Home equity loans	0.7	0.6	0.7	0.7	0.7		0.0	0.0	1.9	0.6
Credit card receivables	2.1	1.9	1.9	2.0	2.0		0.0	2.8	1.6	2.2
Auto loans	2.0	1.7	1.5	1.7	1.3		0.0	0.0	1.0	2.0
Other consumer loans	2.8	2.8	2.4	3.0	3.0		0.0	0.0	0.0	2.8
Commercial and industrial loans	1.0	0.5	0.7	0.7	1.2		0.0	0.0	1.8	0.6
All other loans, leases, and other assets	0.1	0.1	0.1	0.2	0.2		0.0	0.0	0.2	0.1
Total loans, leases, and other assets	2.3	2.1	1.9	2.4	2.0		0.1	2.5	4.3	2.3
Securitized Loans, Leases, and Other Assets 90 Days or More Past Due (%)										
1-4 family residential loans	1.2	1.2	1.1	1.2	0.9		0.0	0.0	17.3	1.0
Home equity loans	0.4	0.3	0.4	0.5	0.3		0.0	0.0	1.2	0.3
Credit card receivables	1.7	1.6	1.8	1.7	1.6		0.0	1.4	1.3	1.8
Auto loans	0.2	0.2	0.2	0.3	0.2		0.0	0.0	0.1	0.2
Other consumer loans	2.1	2.1	2.0	2.1	2.1		0.0	0.0	0.0	2.1
Commercial and industrial loans	0.7	0.6	0.6	0.7	0.8		0.0	0.0	1.4	0.4
All other loans, leases, and other assets	0.1	0.2	0.1	0.2	0.2		0.0	2.0	0.1	0.1
Total loans, leases, and other assets	1.2	1.2	1.1	1.2	1.1		0.0	1.3	7.2	1.1
Securitized Loans, Leases, and Other Assets Charged-Off (net, YTD, annualized, %)										
1-4 family residential loans	0.0	0.0	0.0	0.0	0.0		0.0	0.0	1.6	0.0
Home equity loans	0.1	0.1	0.1	0.3	0.2		0.0	0.0	1.1	0.1
Credit card receivables	3.3	2.2	1.1	3.8	2.9		0.0	2.4	2.2	3.4
Auto loans	0.8	0.5	0.3	0.7	0.5		0.0	0.0	0.4	0.8
Other consumer loans	1.1	0.7	0.4	1.5	1.2		0.0	0.0	0.0	1.1
Commercial and industrial loans	1.3	0.7	0.4	1.3	1.2		0.0	0.0	3.1	0.4
All other loans, leases, and other assets	0.0	0.0	0.0	0.0	0.0		0.0	0.0	0.0	0.0
Total loans, leases, and other assets	0.8	0.5	0.3	1.1	1.2		0.0	2.2	2.0	0.8
Seller's Interests in Institution's Own Securitizations - Carried as Loans										
Home equity loans	494	651	671	869	728	-32.1	0	0	0	494
Credit card receivables	77,451	73,405	61,569	75,225	68,885	12.4	0	239	4,349	72,863
Commercial and industrial loans	6,018	2,843	2,863	2,596	2,891	108.2	0	0	974	5,044
Seller's Interests in Institution's Own Securitizations - Carried as Securities										
Home equity loans	10	10	10	10	11	-9.1	0	0	0	10
Credit card receivables	374	327	281	322	184	103.3	0	71	303	0
Commercial and industrial loans	6	9	1	5	0	0.0	0	0	0	6
Assets Sold with Recourse and Not Securitized										
Number of institutions reporting asset sales	748	735	729	716	708	5.6	157	446	100	45
Outstanding Principal Balance by Asset Type										
1-4 family residential loans	57,454	55,486	58,005	55,777	56,002	2.6	1,003	6,808	2,883	46,760
Home equity, credit card receivables, auto, and other consumer loans	775	601	1,905	708	115	573.9	2	28	12	734
Commercial and industrial loans	5,302	7,708	8,198	6,668	6,781	-21.8	0	188	337	4,776
All other loans, leases, and other assets	21,509	8,035	8,103	6,981	7,403	190.5	1	46	176	21,286
Total sold and not securitized	85,040	71,831	76,210	70,133	70,302	21.0	1,007	7,071	3,407	73,556
Maximum Credit Exposure by Asset Type										
1-4 family residential loans	15,829	14,869	16,112	13,213	13,704	15.5	148	1,511	1,995	12,175
Home equity, credit card receivables, auto, and other consumer loans	742	573	1,869	663	47	1478.7	2	5	7	728
Commercial and industrial loans	3,671	4,453	4,543	4,499	4,479	-18.0	0	169	337	3,165
All other loans, leases, and other assets	6,447	2,383	2,428	2,530	2,502	157.7	1	22	89	6,335
Total credit exposure	26,689	22,278	24,952	20,904	20,732	28.7	151	1,708	2,426	22,403
Support for Securitization Facilities Sponsored by Other Institutions										
Number of institutions reporting securitization facilities sponsored by others	49	50	47	47	48	2.1	24	15	3	7
Total credit exposure	1,477	1,375	1,348	1,135	958	54.2	7	121	100	1,249
Total unused liquidity commitments	8,242	14,093	5,827	5,857	4,718	74.7	0	0	0	8,242
Other										
Assets serviced for others**	3,647,431	3,569,529	3,494,728	3,392,129	3,072,169	18.7	7,553	61,643	120,033	3,458,202
Asset-backed commercial paper conduits										
Credit exposure to conduits sponsored by institutions and others	22,592	22,211	21,404	20,714	19,244	17.4	2	0	112	22,478
Unused liquidity commitments to conduits sponsored by institutions and others	365,850	364,656	327,395	306,435	294,279	24.3	0	0	0	365,850
Net servicing income (for the quarter)	3,634	5,330	3,601	2,159	3,381	7.5	57	123	153	3,301
Net securitization income (for the quarter)	5,642	5,437	5,051	2,407	6,832	-17.4	0	68	285	5,289
Total credit exposure to Tier 1 capital (%)***	6.5	5.7	5.9	5.8	6.1		0.7	1.6	2.5	8.3

*Line item titled "All other loans and all leases" for quarters prior to March 31, 2006

**The amount of financial assets serviced for others, other than closed-end 1-4 family residential mortgages, is reported when these assets are greater than \$10 million

***Total credit exposure includes the sum of the three line items titled "Total credit exposure" reported above

INSURANCE FUND INDICATORS

- **Insured Deposit Growth Increases Only Slightly**
- **DIF Reserve Ratio Rises One Basis Point to 1.22 Percent**
- **One Institution Fails During the Third Quarter**

From June 30 to September 30, total assets of the nation's 8,560 FDIC-insured commercial banks and savings institutions increased by \$446.3 billion (3.6 percent). Total deposits, which increased by \$146.0 billion, funded about one third of this asset growth. Total domestic deposits increased by 0.7 percent in the third quarter. Domestic time deposits increased by 3.3 percent, while other domestic interest-bearing deposits increased by only 0.7 percent and domestic noninterest-bearing deposits decreased by 4.5 percent. Over the 12 months ending September 30, total domestic deposits increased by 4.1 percent, with domestic interest-bearing deposits rising by 5.7 percent but domestic noninterest-bearing deposits declining by 3.1 percent.

Insured institutions in aggregate have reduced their reliance on domestic deposits steadily since the early 1990s. Domestic deposits funded 72 percent of industry assets in 1992, but only fund 53 percent today. Foreign office deposits have funded an increasing share of assets over the same time period, from 7 percent in 1992 to 11 percent today. Foreign deposits as a percent of assets have risen from 8.4 percent in September 2005 to 9.4 percent at September 2006 and 11.3 percent at September 2007. From September 30, 2006 to September 30, 2007, foreign office deposits increased by 30.5 percent. Federal Home Loan Bank (FHLB) advances increased by 21.8 percent over the same twelve-month period. In the third quarter, FHLB advances funded 6.1 percent of assets, up from 5.0 percent in June and 5.4 percent a year ago.

Estimated insured deposits (including U.S. branches of foreign banks) increased slightly during the third quarter of 2007 (0.2 percent increase), compared to a slight decline (0.2 percent decrease) during the second quar-

ter of 2007. Over the last 12 months, insured deposits increased by 3.5 percent. For institutions existing as of September 30, 2007 and June 30, 2007, insured deposits increased during the third quarter at 4,652 institutions (55 percent), decreased at 3,816 institutions (45 percent), and remained unchanged at 49 institutions.

The Deposit Insurance Fund (DIF) increased by 1.0 percent (\$527 million) during the third quarter to \$51,754 million (unaudited). Accrued assessment income added \$170 million to the DIF during the third quarter. The fund received a \$68 million increase from unrealized gains on available for sale securities, and took in \$421 million (net of expenses) from interest on securities and other revenue. The DIF was reduced by \$132 million in additional provisions for insurance losses. The increase in the DIF, together with nearly flat insured deposit growth, raised the DIF reserve ratio to 1.22 percent on September 30, 2007, one basis point higher than the June ratio and equal to the reserve ratio of a year earlier.

One FDIC-insured institution failed during the third quarter of 2007, a federal savings bank with assets of \$2.2 billion. The loss to the DIF is estimated to be approximately \$108 million. For the first nine months of 2007, two institutions with combined assets of \$2.3 billion have failed at an estimated cost of \$117 million. There were no failures of insured institutions during the first nine months of the previous year.

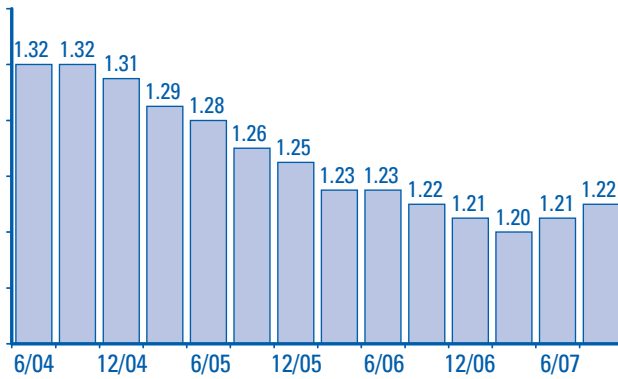
*Author: Kevin Brown, Sr. Financial Analyst
Division of Insurance and Research, FDIC
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TABLE I-B. Insurance Fund Balances and Selected Indicators

(dollar figures in millions)

	Deposit Insurance Fund								
	3rd Quarter 2007	2nd Quarter 2007	1st Quarter 2007	4th Quarter 2006	3rd Quarter 2006	2nd Quarter 2006	1st Quarter 2006	4th Quarter 2005	3rd Quarter 2005
Beginning Fund Balance*	\$51,227	\$50,745	\$50,165	\$49,992	\$49,564	\$49,193	\$48,597	\$48,373	\$48,023
Changes in Fund Balance:									
Assessments earned.....	170	140	94	10	10	7	5	13	20
Interest earned on investment securities.....	640	748	567	476	622	665	478	675	536
Operating expenses.....	243	248	239	248	237	242	224	252	227
Provision for insurance losses.....	132	-3	-73	49	-50	-6	-45	-19	-65
All other income, net of expenses**.....	24	1	4	5	1	12	349	4	3
Unrealized gain/(loss) on available-for-sale securities.....	68	-162	81	-21	-18	-77	-57	-235	-47
Total fund balance change.....	527	482	580	173	428	371	596	224	350
Ending Fund Balance*	51,754	51,227	50,745	50,165	49,992	49,564	49,193	48,597	48,373
Percent change from four quarters earlier.....	3.52	3.36	3.15	3.23	3.35	3.21	3.31	2.29	2.94
Reserve Ratio (%)	1.22	1.21	1.20	1.21	1.22	1.23	1.23	1.25	1.26
Estimated Insured Deposits	4,241,307	4,231,656	4,242,146	4,151,966	4,098,430	4,040,405	4,001,955	3,890,941	3,830,950
Percent change from four quarters earlier.....	3.49	4.73	6.00	6.71	6.98	7.52	8.50	7.42	7.63
Assessment Base	6,881,843	6,815,426	6,801,892	6,595,357	6,439,330	6,386,916	6,272,555	6,177,429	6,038,857
Percent change from four quarters earlier.....	6.87	6.71	8.44	6.77	6.63	8.64	8.15	8.88	9.47
Number of institutions reporting	8,571	8,626	8,662	8,693	8,755	8,790	8,803	8,845	8,870

DIF Reserve Ratio*
Percent of Insured Deposits



Deposit Insurance Fund Balance and Insured Deposits*
(\$ Millions)

	DIF Balance	DIF-Insured Deposits
6/04	46,521	3,531,806
9/04	46,990	3,559,489
12/04	47,507	3,622,068
3/05	47,617	3,688,562
6/05	48,023	3,757,728
9/05	48,373	3,830,950
12/05	48,597	3,890,941
3/06	49,193	4,001,955
6/06	49,564	4,040,405
9/06	49,992	4,098,430
12/06	50,165	4,151,966
3/07	50,745	4,242,146
6/07	51,227	4,231,656
9/07	51,754	4,241,307

TABLE II-B. Problem Institutions and Failed/Assisted Institutions

(dollar figures in millions)

	2007***	2006***	2006	2005	2004	2003	2002
Problem Institutions							
Number of institutions.....	65	47	50	52	80	116	136
Total assets.....	\$18,515	\$3,983	\$8,265	\$6,607	\$28,250	\$29,917	\$38,927
Failed/Assisted Institutions							
Number of institutions.....	2	0	0	0	4	3	11
Total assets.....	\$2,252	\$0	\$0	\$0	\$166	\$1,097	\$2,558

* Prior to 2006, amounts represent sum of separate BIF and SAIF amounts.

** First Quarter 2006 includes previously escrowed revenue from SAIF-member exit fees.

*** Through September 30.

TABLE III-B. Estimated FDIC-Insured Deposits by Type of Institution*(dollar figures in millions)*

September 30, 2007

	Number of Institutions	Total Assets	Domestic Deposits*	Est. Insured Deposits
Commercial Banks and Savings Institutions				
FDIC-Insured Commercial Banks	7,303	10,792,691	5,571,617	3,331,209
FDIC-Supervised	4,767	1,842,731	1,354,199	922,436
OCC-Supervised	1,659	7,492,702	3,400,698	1,920,915
Federal Reserve-Supervised	877	1,457,258	816,720	487,858
FDIC-Insured Savings Institutions	1,257	1,914,422	1,169,544	903,717
OTS-Supervised Savings Institutions	831	1,613,489	956,061	739,217
FDIC-Supervised State Savings Banks	426	300,933	213,483	164,500
Total Commercial Banks and Savings Institutions	8,560	12,707,112	6,741,161	4,234,925
Other FDIC-Insured Institutions				
U.S. Branches of Foreign Banks	11	19,868	8,181	6,381
Total FDIC-Insured Institutions	8,571	12,726,980	6,749,342	4,241,307

* Excludes \$1.44 trillion in foreign office deposits, which are uninsured.

TABLE IV-B. Distribution of Institutions and Assessment Base Among Risk Categories

Quarter Ending June 30, 2007

(dollar figures in billions)

Risk Category	Annual Rate in Basis Points	Number of Institutions	Percent of Total Institutions	Assessment Base	Percent of Total Assessment Base
I - Minimum	5	2,931	34.0%	3,949	57.9%
I - Middle	5.01- 6.00	3,211	37.2%	2,120	31.1%
I - Middle	6.01- 6.99	1,343	15.6%	436	6.4%
I - Maximum	7	665	7.7%	198	2.9%
II	10	413	4.8%	93	1.4%
III	28	53	0.6%	5	0.1%
IV	43	10	0.1%	14	0.2%

Note: Institutions are categorized based on supervisory ratings, debt ratings and financial data as of June 30, 2007.

Rates do not reflect the application of assessment credits. See notes to users for further information on risk categories and rates.

Notes To Users

This publication contains financial data and other information for depository institutions insured by the Federal Deposit Insurance Corporation (FDIC). These notes are an integral part of this publication and provide information regarding the comparability of source data and reporting differences over time.

Tables I-A through VIII-A.

The information presented in Tables I-A through V-A of the *FDIC Quarterly Banking Profile* is aggregated for all FDIC-insured Institutions, both commercial banks and savings institutions. Tables VI-A (Derivatives) and VII-A (Servicing, Securitization, and Asset Sales Activities) aggregate information only for insured commercial banks and state-chartered savings banks that file quarterly Call Reports. Table VIII-A Trust Services aggregates Trust asset and income information collected annually from all FDIC-insured institutions. Some tables are arrayed by groups of FDIC-insured institutions based on predominant types of asset concentration, while other tables aggregate institutions by asset size and geographic region. Quarterly and full-year data are provided for selected indicators, including aggregate condition and income data, performance ratios, condition ratios and structural changes, as well as past due, noncurrent and charge-off information for loans outstanding and other assets.

Tables I-B through IV-B.

A separate set of tables (Tables I-B through IV-B) provides comparative quarterly data related to the Deposit Insurance Fund (DIF), problem institutions, failed/assisted institutions, estimated FDIC-insured deposits, as well as assessment rate information. Depository institutions that are not insured by the FDIC through the DIF are not included in the *FDIC Quarterly Banking Profile*. U.S. branches of institutions headquartered in foreign countries and non-deposit trust companies are not included unless otherwise indicated. Efforts are made to obtain financial reports for all active institutions. However, in some cases, final financial reports are not available for institutions that have closed or converted their charters.

DATA SOURCES

The financial information appearing in this publication is obtained primarily from the Federal Financial Institutions Examination Council (FFIEC) *Call Reports* and the OTS *Thrift Financial Reports* submitted by all FDIC-insured depository institutions. This information is stored on and retrieved from the FDIC's Research Information System (RIS) data base.

COMPUTATION METHODOLOGY

Certain adjustments are made to the OTS *Thrift Financial Reports* to provide closer conformance with the reporting and accounting requirements of the FFIEC *Call Reports*. Parent institutions are required to file consolidated reports, while their subsidiary financial institutions are still required to file separate reports. Data from subsidiary institution reports are included in the *Quarterly Banking Profile* tables, which can lead to double-counting. No adjustments are made for any double-counting of subsidiary data.

All asset and liability figures used in calculating performance ratios represent average amounts for the period (beginning-of-period amount plus end-of-period amount plus any interim periods, divided by the total number of periods). For "pooling-of-interest" mergers, the assets of the acquired institution(s) are included in average assets since the year-to-date income includes the results of all merged institutions. No adjustments are made for "purchase accounting" mergers.

Growth rates represent the percentage change over a 12-month period in totals for institutions in the base period to totals for institutions in the current period.

All data are collected and presented based on the location of each reporting institution's main office. Reported data may include assets and liabilities located outside of the reporting institution's home state. In addition, institutions may relocate across state lines or change their charters, resulting in an inter-regional or inter-industry migration, e.g., institutions can move their home offices between regions, and savings institutions can convert to commercial banks or commercial banks may convert to savings institutions.

ACCOUNTING CHANGES

FASB Statement No. 157 Fair Value Measurements issued in September 2006 and FASB Statement No. 159 The Fair Value Option for Financial Assets and Financial Liabilities issued in February 2007 – both are effective in 2008 with early adoption permitted in 2007. FAS 157 defines a fair value measurement framework, while FAS 159 allows banks to elect a fair value option when assets are recognized on the balance sheet and to report certain financial assets and liabilities at fair value with subsequent changes in fair value included in earnings. Existing eligible items can be fair-valued as early as January 2007 under FAS 159, if a bank adopts FAS 157.

FASB Statement 158 Employers' Accounting for Defined Benefit Pension and Other Postretirement Plans – issued in September 2006 requires a bank to recognize in 2007 the funded status of its postretirement plans on its balance sheet. An overfunded plan is recognized as an asset and an underfunded plan is recognized as a liability. An adjustment is made to equity as accumulated other comprehensive income (AOCI) upon application of FAS 158 and AOCI is adjusted in subsequent periods as net periodic benefit costs are recognized in earnings.

FASB Statement No. 156 Accounting for Servicing of Financial Assets – issued in March 2006 and effective in 2007, requires all separately recognized servicing assets and liabilities to be initially measured at fair value and allows a bank the option to subsequently adjust that value by periodic revaluation and recognition of earnings or by periodic amortization to earnings.

Purchased Impaired Loans and Debt Securities – Statement of Position 03-3, *Accounting for Certain Loans or Debt Securities Acquired in a Transfer*. The SOP applies to loans and debt securities acquired in fiscal years beginning after December 15, 2004. In general, this Statement of Position applies to "purchased impaired loans and debt securities," i.e., loans and debt securities that a bank has purchased, including those acquired in a purchase business combination, when it is probable, at the purchase date, that the bank will be unable to collect all contractually required payments receivable. Banks must follow Statement of Position 03-3 for Call Report purposes. The SOP does not apply to the loans that a bank has originated, prohibits "carrying over" or creation of valuation allowances in the initial accounting and any subsequent valuation allowances reflect only those losses incurred by the investor after acquisition.

GNMA Buy-back Option – If an issuer of GNMA securities has the option to buy back the loans that collateralize the GNMA securities, when certain delinquency criteria are met, FASB Statement No. 140 requires that loans with this buy-back option must be brought back on the issuer's books as assets. The rebooking of GNMA loans is required regardless of whether the issuer intends to exercise the buy-back option. The banking agencies clarified in May 2005 that all GNMA loans that are rebooked because of delinquency should be reported as past due according to their contractual terms.

FASB Interpretation No. 45 – In November 2002, the FASB issued Interpretation No. 45, *Guarantor's Accounting and Disclosure Requirements for Guarantees, Including Indirect Guarantees of Indebtedness of Others*. This interpretation clarifies that a guarantor is required to recognize, at the inception of a guarantee (financial standby letters of credit, performance standby letters of credit), a liability for the fair value of the obligation undertaken in issuing the guarantee. Banks apply the initial recognition and measurement provisions of Interpretation No. 45 on a prospective basis to guarantees issued or modified after December 31, 2002, irrespective of the bank's fiscal year end. A bank's previous accounting for guarantees issued prior to January 1, 2003, is not revised.

FASB Interpretation No. 46 – The FASB issued Interpretation No. 46, *Consolidation of Variable Interest Entities*, in January 2003 and revised it in December 2003. Generally, banks with variable interests in variable interest entities created after December 31, 2003, must consolidate them. The timing of consolidation varies with certain situations with application as late as 2005. The assets and liabilities of a consolidated variable interest entity are reported on a line-by-line basis according to the asset and liability categories shown on the bank's balance sheet, as well as related income items. Most small banks are unlikely to have any "variable interests" in variable interest entities.

FASB Statement No. 123 (Revised 2004) and Share-Based Payments

– requires all entities to recognize compensation expense in an amount equal to the fair value of share-based payments, e.g., stock options and restricted stock, granted to employees. As of January 2006 all banks must adopt FAS 123(R). The compensation cost is typically recognized over the vesting period with a corresponding credit to equity. The recording of the compensation cost also gives rise to a deferred tax asset.

Goodwill and intangible assets – FAS 141 terminates the use of pooling-of-interest accounting for business combinations after 2001 and requires purchase accounting. Under FAS 142 amortization of goodwill is eliminated. Only intangible assets other than goodwill are amortized each quarter. In addition companies are required to test for impairment of both goodwill and other intangibles once each fiscal year. The year 2002, the first fiscal year affected by this accounting change, has been designated a transitional year and the amount of initial impairments are to be recorded as extraordinary losses on a "net of tax" basis (and not as noninterest expense). Subsequent annual review of intangibles and goodwill impairment may require additional noninterest expense recognition. FASB Statement No. 147 clarifies that acquisitions of financial institutions (except transactions between two or more mutual enterprises), including branch acquisitions that meet the definition of a business combination, should be accounted for by the purchase method under FASB Statement No. 141. This accounting standard includes transition provisions that apply to unidentifiable intangible assets previously accounted for in accordance with FASB Statement No. 72. If the transaction (such as a branch acquisition) in which an unidentifiable intangible asset arose does not meet the definition of a business combination, this intangible asset is not to be reported as "Goodwill" on the Call Report balance sheet. Rather, this unidentifiable intangible asset is reported as "Other intangible assets," and must continue to be amortized and the amortization expense should be reported in the Call Report income statement.

FASB Statement No. 133 Accounting for Derivative Instruments and Hedging Activities – All banks must recognize derivatives as either assets or liabilities on the balance sheet, measured at fair value. A derivative may be specifically designated as a "fair value hedge," a "cash flow hedge," or a hedge of a foreign currency exposure. The accounting for changes in the value of a derivative (gains and losses) depends on the intended use of the derivative, its resulting designation, and the effec-

tiveness of the hedge. Derivatives held for purposes other than trading are reported as "other assets" (positive fair values) or "other liabilities" (negative fair values). For a fair value hedge, the gain or loss is recognized in earnings and "effectively" offsets loss or gain on the hedged item attributable to the risk being hedged. Any ineffectiveness of the hedge could result in a net gain or loss on the income statement. Accumulated net gains (losses) on cash flow hedges are recorded on the balance sheet as "accumulated other comprehensive income" and the periodic change in the accumulated net gains (losses) for cash flow hedges is reflected directly in equity as the value of the derivative changes. FASB Statement No. 149, Amendment of Statement 133 on Derivative Instruments and Hedging Activities provides guidance on the circumstances in which a loan commitment must be accounted for as derivative. Under Statement No. 149, loan commitments that relate to the origination of mortgage loans that will be held for sale, commonly referred to as interest rate lock commitments, must be accounted for as derivatives on the balance sheet by the issuer of the commitment.

DEFINITIONS (in alphabetical order)

All other assets – total cash, balances due from depository institutions, premises, fixed assets, direct investments in real estate, investment in unconsolidated subsidiaries, customers' liability on acceptances outstanding, assets held in trading accounts, federal funds sold, securities purchased with agreements to resell, fair market value of derivatives, and other assets.

All other liabilities – bank's liability on acceptances, limited-life preferred stock, allowance for estimated off-balance-sheet credit losses, fair market value of derivatives, and other liabilities.

Assessment base – assessable deposits consist of DIF deposits (deposits insured by the FDIC Deposit Insurance Fund) in banks' domestic offices with certain adjustments.

Assets securitized and sold – total outstanding principal balance of assets securitized and sold with servicing retained or other seller-provided credit enhancements.

Construction and development loans – includes loans for all property types under construction, as well as loans for land acquisition and development.

Core capital – common equity capital plus noncumulative perpetual preferred stock plus minority interest in consolidated subsidiaries, less goodwill and other ineligible intangible assets. The amount of eligible intangibles (including servicing rights) included in core capital is limited in accordance with supervisory capital regulations.

Cost of funding earning assets – total interest expense paid on deposits and other borrowed money as a percentage of average earning assets.

Credit enhancements – techniques whereby a company attempts to reduce the credit risk of its obligations. Credit enhancement may be provided by a third party (external credit enhancement) or by the originator (internal credit enhancement), and more than one type of enhancement may be associated with a given issuance.

Deposit Insurance Fund (DIF) – The Bank (BIF) and Savings Association (SAIF) Insurance Funds were merged in 2006 by the Federal Deposit Insurance Reform Act to form the DIF.

Derivatives notional amount – The notional or contractual amounts of derivatives represent the level of involvement in the types of derivatives transactions and are not a quantification of market risk or credit risk. Notional amounts represent the amounts used to calculate contractual cash flows to be exchanged.

Derivatives credit equivalent amount – the fair value of the derivative plus an additional amount for potential future credit exposure based on the notional amount, the remaining maturity and type of the contract.

Derivatives transaction types:

Futures and forward contracts – contracts in which the buyer agrees to purchase and the seller agrees to sell, at a specified future date, a specific quantity of an underlying variable or index at a specified price or yield. These contracts exist for a variety of variables or indices, (traditional agricultural or physical commodities, as well as currencies and interest rates). Futures contracts are standardized and are traded on organized exchanges which set limits on counterparty credit exposure. Forward contracts do not have standardized terms and are traded over the counter.

Option contracts – contracts in which the buyer acquires the right to buy from or sell to another party some specified amount of an underlying variable or index at a stated price (strike price) during a period or on a specified future date, in return for compensation (such as a fee or premium). The seller is obligated to purchase or sell the variable or index at the discretion of the buyer of the contract.

Swaps – obligations between two parties to exchange a series of cash flows at periodic intervals (settlement dates), for a specified period. The cash flows of a swap are either fixed, or determined for each settlement date by multiplying the quantity (notional principal) of the underlying variable or index by specified reference rates or prices. Except for currency swaps, the notional principal is used to calculate each payment but is not exchanged.

Derivatives underlying risk exposure – the potential exposure characterized by the level of banks' concentration in particular underlying instruments, in general. Exposure can result from market risk, credit risk and operational risk, as well as, interest rate risk.

Domestic deposits to total assets – total domestic office deposits as a percent of total assets on a consolidated basis.

Earning assets – all loans and other investments that earn interest or dividend income.

Efficiency ratio – Noninterest expense less amortization of intangible assets as a percent of net interest income plus noninterest income. This ratio measures the proportion of net operating revenues that are absorbed by overhead expenses, so that a lower value indicates greater efficiency.

Estimated insured deposits – in general, insured deposits are total domestic deposits minus estimated uninsured deposits. Prior to June 30, 2000, the uninsured estimate is calculated as the sum of the excess amounts in accounts over \$100,000. Beginning June 30, 2000, the amount of estimated uninsured deposits is adjusted to consider a financial institution's own estimate of uninsured deposits when such an estimate is reported. Beginning in 2006, the uninsured deposits estimate also considers IRA accounts over \$250,000.

Failed/assisted institutions – an institution fails when regulators take control of the institution, placing the assets and liabilities into a bridge bank, conservatorship, receivership, or another healthy institution. This action may require the FDIC to provide funds to cover losses. An institution is defined as "assisted" when the institution remains open and receives some insurance funds in order to continue operating.

FHLB advances – all borrowings by FDIC insured institutions from the Federal Home Loan Bank System (FHLB), as reported by Call Report filers and by TFR filers.

Goodwill and other intangibles – intangible assets include servicing rights, purchased credit card relationships and other identifiable intangible assets. Goodwill is the excess of the purchase price over the fair market value of the net assets acquired.

Loans secured by real estate – includes home equity loans, junior liens secured by 1-4 family residential properties and all other loans secured by real estate.

Loans to individuals – includes outstanding credit card balances and other secured and unsecured consumer loans.

Long-term assets (5+ years) – loans and debt securities with remaining maturities or repricing intervals of over five years.

Maximum credit exposure – the maximum contractual credit exposure remaining under recourse arrangements and other seller-provided credit enhancements provided by the reporting bank to securitizations.

Mortgage-backed securities – certificates of participation in pools of residential mortgages and collateralized mortgage obligations issued or guaranteed by government-sponsored or private enterprises. Also, see "Securities", below.

Net charge-offs – total loans and leases charged off (removed from balance sheet because of uncollectibility), less amounts recovered on loans and leases previously charged off.

Net interest margin – the difference between interest and dividends earned on interest-bearing assets and interest paid to depositors and other creditors, expressed as a percentage of average earning assets. No adjustments are made for interest income that is tax exempt.

Net loans to total assets – loans and lease financing receivables, net of unearned income, allowance and reserves, as a percent of total assets on a consolidated basis.

Net operating income – income excluding discretionary transactions such as gains (or losses) on the sale of investment securities and extraordinary items. Income taxes subtracted from operating income have been adjusted to exclude the portion applicable to securities gains (or losses).

Noncurrent assets – the sum of loans, leases, debt securities and other assets that are 90 days or more past due, or in nonaccrual status.

Noncurrent loans & leases – the sum of loans and leases 90 days or more past due, and loans and leases in nonaccrual status.

Number of institutions reporting – the number of institutions that actually filed a financial report.

Other borrowed funds – federal funds purchased, securities sold with agreements to repurchase, demand notes issued to the U.S. Treasury, FHLB advances, other borrowed money, mortgage indebtedness, obligations under capitalized leases and trading liabilities, less revaluation losses on assets held in trading accounts.

Other real estate owned – primarily foreclosed property. Direct and indirect investments in real estate ventures are excluded. The amount is reflected net of valuation allowances. For institutions that file a Thrift Financial Report (TFR), the valuation allowance subtracted also includes allowances for other repossessed assets. Also, for TFR filers the components of other real estate owned are reported gross of valuation allowances.

Percent of institutions with earnings gains – the percent of institutions that increased their net income (or decreased their losses) compared to the same period a year earlier.

"Problem" institutions – federal regulators assign a composite rating to each financial institution, based upon an evaluation of financial and operational criteria. The rating is based on a scale of 1 to 5 in ascend-

ing order of supervisory concern. “Problem” institutions are those institutions with financial, operational, or managerial weaknesses that threaten their continued financial viability. Depending upon the degree of risk and supervisory concern, they are rated either a “4” or “5”. For all insured commercial banks and for insured savings banks for which the FDIC is the primary federal regulator, FDIC composite ratings are used. For all institutions whose primary federal regulator is the OTS, the OTS composite rating is used.

Recourse – an arrangement in which a bank retains, in form or in substance, any credit risk directly or indirectly associated with an asset it has sold (in accordance with generally accepted accounting principles) that exceeds a pro rata share of the bank’s claim on the asset. If a bank has no claim on an asset it has sold, then the retention of any credit risk is recourse.

Reserves for losses – the allowance for loan and lease losses on a consolidated basis.

Restructured loans and leases – loan and lease financing receivables with terms restructured from the original contract. Excludes restructured loans and leases that are not in compliance with the modified terms.

Retained earnings – net income less cash dividends on common and preferred stock for the reporting period.

Return on assets – net income (including gains or losses on securities and extraordinary items) as a percentage of average total assets. The basic yardstick of bank profitability.

Return on equity – net income (including gains or losses on securities and extraordinary items) as a percentage of average total equity capital.

Risk-based capital groups – definition:

(Percent)	Total Risk-Based Capital *	Tier 1 Risk-Based Capital *	Tier 1 Leverage	Tangible Equity
Well-capitalized	≥10	and ≥6	and ≥5	–
Adequately capitalized	≥8	and ≥4	and ≥4	–
Undercapitalized	≥6	and ≥3	and ≥3	–
Significantly undercapitalized	<6	or <3	or <3	and >2
Critically undercapitalized	–	–	–	≤2

*As a percentage of risk-weighted assets.

Risk Categories and Assessment Rate Schedule – The current risk categories and assessment rate schedule became effective January 1, 2007. Capital ratios and supervisory ratings distinguish one risk category from another. The following table shows the relationship of risk categories (I, II, III, IV) to capital and supervisory groups as well as the

Capital Group	Supervisory Group		
	A	B	C
1. Well Capitalized	I 5-7 bps	II 10 bps	III 28 bps
2. Adequately Capitalized			
3. Undercapitalized	III 28 bps		IV 43 bps

assessment rates (in basis points) for each risk category. Supervisory Group A generally includes institutions with CAMELS composite ratings of 1 or 2; Supervisory Group B generally includes institutions with a CAMELS composite rating of 3; and Supervisory Group C generally includes institutions with CAMELS composite ratings of 4 or 5. For purposes of risk-based assessment capital groups, undercapitalized includes institutions that are significantly or critically undercapitalized.

Assessment rates are 3 basis points above the base rate schedule. The FDIC may adjust rates up or down by 3 basis points from the base rate schedule without notice and comment, provided that any single adjustment from one quarter to the next cannot move rates more than 3 basis points.

For most institutions in Risk Category I, the assessment rate assigned will be based on a combination of financial ratios and CAMELS component ratings.

For large institutions in Risk Category I (generally those with at least \$10 billion in assets) that have long-term debt issuer ratings, assessment rates will be determined by weighting CAMELS component ratings 50 percent and long-term debt issuer ratings 50 percent. For all large Risk Category I institutions, additional risk factors will be considered to determine whether assessment rates should be adjusted. This additional information includes market data, financial performance measures, considerations of the ability of an institution to withstand financial stress, and loss severity indicators. Any adjustment will be limited to no more than ½ basis point.

Beginning in 2007, each institution is assigned a risk-based rate for a quarterly assessment period near the end of the quarter following the assessment period. Payment will generally be due on the 30th day of the last month of the quarter following the assessment period. Supervisory rating changes will be effective for assessment purposes as of the examination transmittal date. For institutions with long-term debt issuer ratings, changes in ratings will be effective for assessment purposes as of the date the change was announced.

Risk-weighted assets – assets adjusted for risk-based capital definitions which include on-balance-sheet as well as off-balance-sheet items multiplied by risk-weights that range from zero to 100 percent. A conversion factor is used to assign a balance sheet equivalent amount for selected off-balance-sheet accounts.

Securities – excludes securities held in trading accounts. Banks’ securities portfolios consist of securities designated as “held-to-maturity”, which are reported at amortized cost (book value), and securities designated as “available-for-sale”, reported at fair (market) value.

Securities gains (losses) – realized gains (losses) on held-to-maturity and available-for-sale securities, before adjustments for income taxes. Thrift Financial Report (TFR) filers also include gains (losses) on the sales of assets held for sale.

Seller’s interest in institution’s own securitizations – the reporting bank’s ownership interest in loans and other assets that have been securitized, except an interest that is a form of recourse or other seller-provided credit enhancement. Seller’s interests differ from the securities issued to investors by the securitization structure. The principal amount of a seller’s interest is generally equal to the total principal amount of the pool of assets included in the securitization structure less the principal amount of those assets attributable to investors, i.e., in the form of securities issued to investors.

Subchapter S Corporation – A Subchapter S corporation is treated as a pass-through entity, similar to a partnership, for federal income tax purposes. It is generally not subject to any federal income taxes at the

corporate level. This can have the effect of reducing institutions' reported taxes and increasing their after-tax earnings.

Trust assets – market value, or other reasonably available value of fiduciary and related assets, to include marketable securities, and other financial and physical assets. Common physical assets held in fiduciary accounts include real estate, equipment, collectibles, and household goods. Such fiduciary assets are not included in the assets of the financial institution.

Unearned income & contra accounts – unearned income for Call Report filers only.

Unused loan commitments – includes credit card lines, home equity lines, commitments to make loans for construction, loans secured by commercial real estate, and unused commitments to originate or purchase loans. (Excluded are commitments after June 2003 for originated mortgage loans held for sale, which are accounted for as derivatives on the balance sheet.)

Volatile liabilities – the sum of large-denomination time deposits, foreign-office deposits, federal funds purchased, securities sold under agreements to repurchase, and other borrowings.

Yield on earning assets – total interest, dividend and fee income earned on loans and investments as a percentage of average earning assets.

Feature Article:

The Case for Loan Modification

With a Foreword by Sheila C. Bair, Chairman
Federal Deposit Insurance Corporation

Foreword

Residential mortgage credit quality continues to weaken, with both delinquencies and charge-offs on the rise at FDIC-insured institutions.¹ This trend, in tandem with upward pricing of hybrid adjustable-rate mortgage (ARM) loans, falling home prices, and fewer refinancing options, underscores the urgency of finding a workable solution to current problems in the subprime mortgage market. Legislators, regulators, bankers, mortgage servicers, and consumer groups have been debating the merits of strategies that may help preserve home ownership, minimize foreclosures, and restore some stability to local housing markets.

On December 6, 2007, an industry-led plan was announced that will help avert foreclosure for certain subprime homeowners who face unaffordable payments when their interest rates reset. This plan provides for a streamlined process to extend the starter rates on subprime ARMs for at least five years in cases where borrowers remain current on their loans but cannot

refinance or afford the higher payments after reset. An important component of the industry-led plan is detailed reporting of loan modification activity. Working with the Treasury Department and other bank regulators, the FDIC will monitor loan modification levels and seek adjustments to the protocols if warranted.

I have long advocated a systematic and streamlined approach to loan modification that puts borrowers into long-term, sustainable mortgages. I support the industry plan as a means to allow borrowers to remain in their homes, provide investors with higher returns than can be obtained under foreclosure, and strengthen local neighborhoods where foreclosures are already driving down property values. It is my hope that this plan will be implemented in a way that delivers real progress on these important policy goals.

*Sheila C. Bair, Chairman
Federal Deposit Insurance Corporation*

¹ *FDIC Quarterly Banking Profile*, Third Quarter 2007, <http://www2.fdic.gov/qbp/2007sep/qbp.pdf>.

The Case for Loan Modification

The text of this article is based on testimony delivered by Sheila C. Bair, Chairman, Federal Deposit Insurance Corporation, on December 6, 2007, before the U.S. House of Representatives Financial Services Committee.

Problems in the subprime mortgage market are affecting the U.S. housing market and the economy as a whole and pose a serious policy challenge for the industry and regulators. About 1.7 million hybrid loans worth \$367 billion are scheduled to undergo their first reset during 2008 and 2009.² This wave of mortgage resets, in combination with the decline in home prices and limited refinancing options, could prompt hundreds of thousands of additional mortgage foreclosures over the next two years. These foreclosures will hurt individual borrowers and their communities, as they potentially could place further downward pressure on home values.

This article summarizes the current situation in the subprime mortgage market. It describes loan modification as a straightforward strategy the mortgage industry can undertake on its own to minimize unnecessary foreclosures and return some measure of stability to housing markets. Misconceptions about the effects of such an approach are also addressed.

U.S. Housing Markets and Mortgage Credit Performance Have Deteriorated

The U.S. housing boom of the first half of this decade ended abruptly in 2006. Housing starts, which peaked at more than 2 million units in 2005, have plummeted to just over half that level, with no recovery in sight. Home prices, which were increasing at double-digit rates nationally in 2004 and 2005, are now falling in many areas across the country (see Chart 1). As home prices decline, the number of problem mortgages, particularly in subprime and Alt-A portfolios, is rising.³ As of third quarter 2007, the percentage of subprime adjustable-rate mortgages (ARMs) that were seriously

delinquent or in foreclosure reached 15.6 percent, more than double the level of a year ago (see Chart 2).⁴ The deterioration in credit performance began in the industrial Midwest, where economic conditions have been the weakest, but has now spread to the former boom markets of Florida, California, and other coastal states.

During the past year, investors and ratings agencies have repeatedly downgraded assumptions about subprime credit performance. A Merrill Lynch study published in July estimated that if U.S. home prices fell only 5 percent, subprime credit losses to investors would total just under \$150 billion, and Alt-A credit losses would total \$25 billion.⁵ On the heels of this report came news that the S&P/Case-Shiller Composite Home Price Index for 10 large U.S. cities had fallen in August to a level that was *already* 5 percent lower than a year ago, with the likelihood of a similar decline over the coming year.

The complexity of many mortgage-backed securitization structures has heightened the overall risk aversion of investors, resulting in what has become a broader illiquidity in global credit markets. These disruptions have led to a precipitous decline in subprime lending, a significant reduction in the availability of Alt-A loans, and higher interest rates on jumbo loans (see Chart 3). The tightening in mortgage credit has placed further downward pressure on home sales and home prices, a situation that now could derail the U.S. economic expansion.

Subprime Hybrid Mortgages and Securitization

The crisis in subprime mortgage lending began with the rapid growth of two- and three-year adjustable-rate subprime hybrid loans after 2003. Between year-end 2003 and mid-2007, some 5 million of these loans were originated. Of these, slightly more than 2.5 million loans representing \$526 billion of mortgage debt remain outstanding.

² Estimates are based on the LoanPerformance Securities database. They reflect data collected through August 2007 on first-lien mortgages secured by owner-occupied properties where the mortgage has been securitized in private mortgage-backed securities issues. These figures have been adjusted to include an estimate of subprime securitized loans that are not included in the LoanPerformance database.

³ Alt-A loans are those made under expanded underwriting guidelines to borrowers with marginal to very good credit. Alt-A loans are riskier than prime loans because of the underwriting standards of the loans, not necessarily the credit quality of the borrowers.

⁴ Mortgage Bankers Association, *National Delinquency Survey Q307*. Data cited are not seasonally adjusted.

⁵ Merrill Lynch, "Mortgage Credit Losses: How Much, Where, and When?" July 20, 2007.

Chart 1

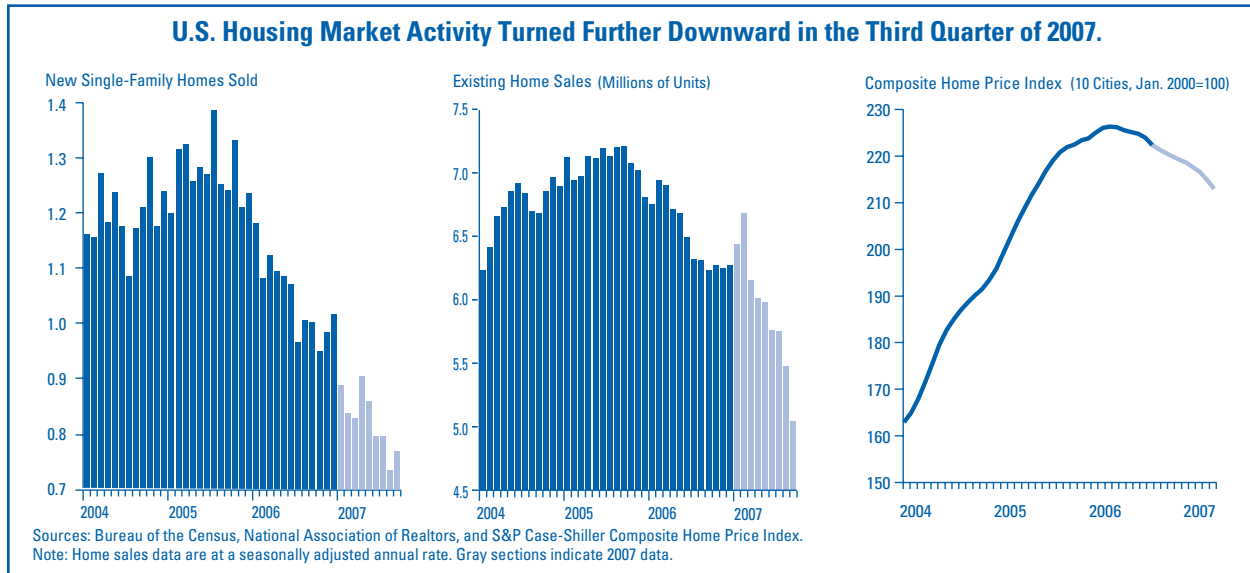


Chart 2

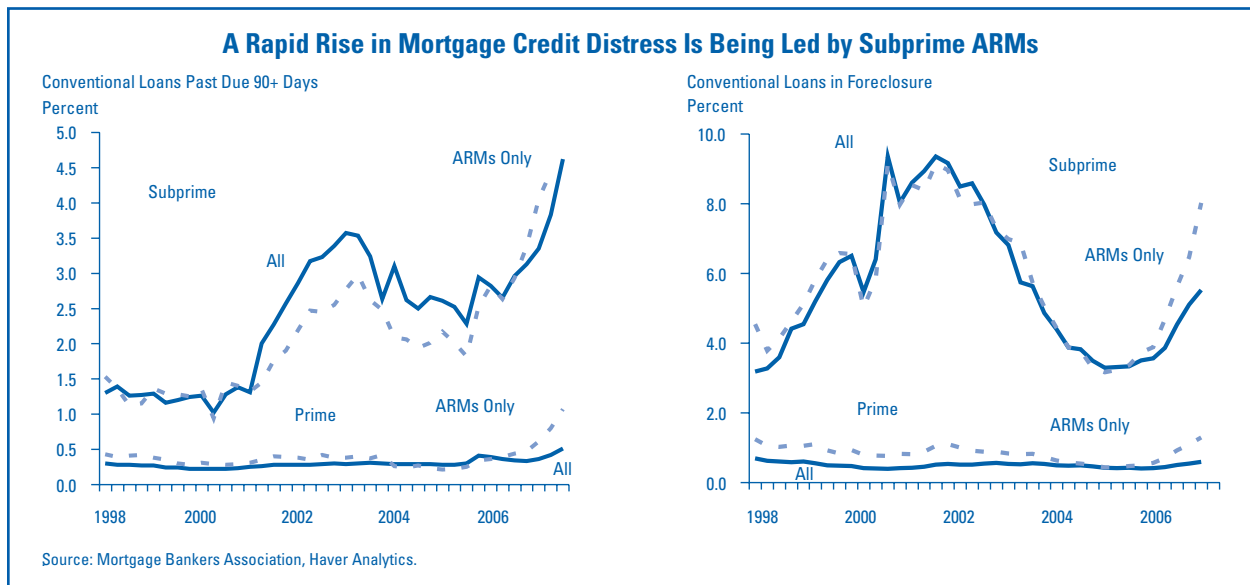
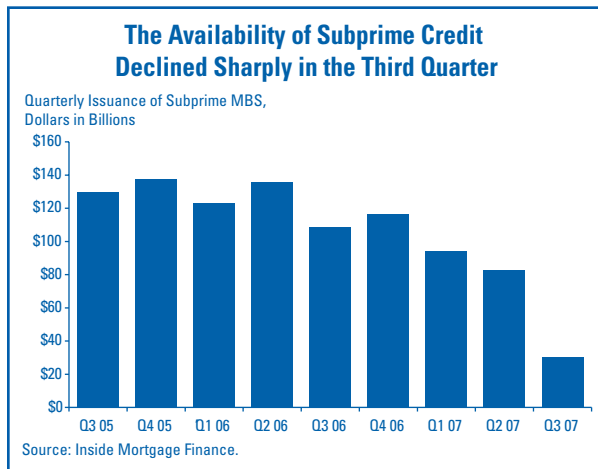


Chart 3



The typical structure of these loans provides for a fixed starter rate (typically between 7 and 9 percent) for the first 24 or 36 months, followed by a series of steep increases in the interest rate (typically 300 basis points during the first year after reset) and a commensurate rise in the monthly payment (see Table 1). Almost three-quarters of subprime mortgages securitized in 2004 and 2005 were structured in this manner, as were more than half the subprime loans made in 2006. Most of these loans, commonly referred to as 2/28 and 3/27 ARMs, also imposed a prepayment penalty if the loan was repaid while the starter rate was in effect.

Despite the steep “payment shock” built into these loans, they performed reasonably well until last year. As recently as second quarter 2006, just 6.5 percent of subprime ARMs were seriously delinquent. Rapid rates of home price appreciation in many areas of the country allowed even highly leveraged borrowers to refinance

Table 1

Hybrid Loan Borrowers May Experience a Series of Rate Reset Shocks			
Weighted-Average Interest Rates for Two- and Three-Year Nonprime First Lien Hybrids			
Origination Year	Average Initial Rate	Maximum Rate at First Reset	Maximum Lifetime Interest Rate
2003	7.37	9.79	13.67
2004	6.85	9.41	13.16
2005	7.23	9.79	13.53
2006	8.23	10.77	14.53

Source: LoanPerformance ABS database. Data for nonprime two- and three-year hybrids included in private label securitizations. Data current through August 2007. All averages are weighted by loan origination amount.

or sell their home when the loans reset without a loss to themselves or mortgage investors, masking the underlying weakness of the structure and underwriting of these loan products. However, in today’s more challenging environment, the ability of borrowers to refinance is limited, and payment reset will more often lead to default and foreclosure.

The securitization of subprime hybrid ARMs has been very common in recent years and increases the complexity of achieving loan modifications. Once these loans are placed in a securitization trust, the assessment of borrower ability to repay is determined by the loan servicer. As stated in the pooling and servicing agreement (PSA), the servicer’s primary objective is to maximize the value of the assets in the securitization trust; therefore, the servicer’s interests are primarily aligned with the investor’s.⁶ When confronted with a distressed borrower who will impact the trust’s cash flow, the servicer must (1) protect the interests of investors and (2) conduct a net present value (NPV) analysis to determine the appropriate loss mitigation strategy in a default scenario. Although initially there was concern that the securitization documents and the PSAs might constrain servicers’ ability to modify loans in the pool, most documents provide the servicers with sufficient flexibility to do so. In practice, however, third-party servicers have been slow to exercise this flexibility on a large scale.

In addition to maximizing asset value, servicers must ensure that they pursue loss mitigation actions that will present the least amount of loss to the pool. Generally, servicers that conduct an NPV analysis and conclude that the NPV of the modified loan payments is greater than the anticipated net recovery in the case of foreclosure may assert that the modification is in the best interest of the securitization of the pool as a whole. In many circumstances, particularly in the case of a declining housing market, the cost of modification will be less than the cost of foreclosure.

A Proposal for Loan Modification

The seriousness of the problems in the subprime mortgage market points to the need for new and innovative strategies to limit the immediate fallout in a way that

⁶ The PSA describes the servicer’s roles and responsibilities. It also discusses the servicing of the mortgage loans and addresses foreclosure and loss mitigation alternatives, including modifications.

will not harm the credit markets over the long run. The proposal that has garnered the most support in recent months is *loan modification* targeted at the group of loans that remains current at the starter rate, but may face default and foreclosure after rates reset.

This approach applies the notion of triage to subprime borrowers. Conceptually, subprime borrowers can be divided into three basic groups:

- Loans already past due under the starter rate that either cannot be remedied or will need to be re-underwritten and restructured on a case-by-case basis;
- Well-structured and well-underwritten loans that can reasonably be expected to perform after reset without modification; and
- Marginal loans that have remained current prior to reset, but likely will not remain so after reset without modification.

Based on available data on securitized subprime loans, it is difficult to estimate precisely the size of each group. We do know that of the 1.7 million subprime loans worth \$367 billion scheduled to reset during 2008 and 2009, some 221,000 loans are already at least 90 days past due or in some stage of foreclosure before reset.⁷ This represents a reasonable estimate of the first group, which is made up of more difficult cases where problems go deeper than just the interest rate reset.

We can also roughly estimate the size of the second group—loans that can reasonably be expected to perform after reset without modification—in terms of loan characteristics at origination. However, because these loans were underwritten according to standards that were well below traditional industry norms, the number that can be expected to perform after reset appears to be small. Of loans scheduled to reset in 2008 and 2009 that remain current, only 2.9 percent (or about 50,000 loans) show a combined loan-to-value ratio below 80 percent and a debt service-to-income ratio below 30 percent at origination. This implies that the third group—loans that remain current prior to reset

⁷ Estimates are based on the LoanPerformance Securities database. They reflect data collected through August 2007 on first-lien mortgages secured by owner-occupied properties where the mortgage has been securitized in private MBS issues. These figures have been adjusted to include an estimate of subprime securitized loans that are not included in the LoanPerformance database.

but face a higher likelihood of problems after reset—may range as high as 1.4 million loans.⁸ A strategy of either streamlined refinancing or streamlined restructuring, or both, appears to offer the greatest potential to improve outcomes for all parties when applied to this third and largest group of subprime loans.

When feasible, the best option appears to be providing opportunities for borrowers to refinance their high-cost loans into affordable fixed-rate loans. Refinancing provides a near-term, full recovery of principal to investors and the potential for a long-term, stable source of financing to borrowers. However, the decision to refinance must take into account the availability and cost of credit to marginal borrowers, as well as the transactions cost to borrowers, including any prepayment penalties. The disruption of mortgage and credit markets that has taken place since mid-2007 has curtailed access to credit for many subprime and Alt-A borrowers, and sharply limited terms on credit for others. In response to these developments, private and government-related loan programs have been established to help expand refinancing options for subprime borrowers. For example, an estimated 240,000 subprime borrowers will eventually be able to refinance under the new *FHASecure* program.⁹

In the remaining cases where refinancing is not an option, servicers will be left with a very limited set of choices as they try to maximize the net proceeds of loans under their management. The standard procedure has been to wait until the loan enters default and then initiate foreclosure proceedings. While this strategy makes sense in an environment when defaults are relatively rare and home prices are stable, it becomes increasingly self-defeating in situations where defaults are common and home prices are falling. It is in these situations that a shift toward streamlined restructuring can help servicers maximize the amount of monthly payments that come in from borrowers and minimize the credit losses that arise from foreclosure.

The rapid pace of resets—nearly 100,000 per month at present—and the deterioration in housing market conditions argue for a systematic, rather than a one-

⁸ It should be noted that as we move into 2008, the total number of loans scheduled to reset will tend to decline as loans default or are paid down, and the proportion of loans that are seriously delinquent prior to reset will tend to rise over time. The net effect is likely to be a gradual decline over time in the number of loans considered candidates for restructuring.

⁹ Federal Housing Administration press release, August 31, 2007. <http://www.fha.gov/press/2007-08-31release.cfm>.

at-a-time, approach to the problem. Moving forward on a wholesale basis in cases where reset is the problem will free up resources for servicers to concentrate on more difficult cases where the solutions may be more complicated and time consuming. The key issue is how to address mortgage loans for owner-occupied properties where the borrowers are current on their payments but will not be able to maintain the payments following reset. Where the homeowner has remained current at the starter rate, but cannot make the higher reset payments, a better strategy is to modify the loan to keep it at the starter rate for a period of five years or more.

Correcting Misconceptions about Mortgage Restructuring

Subprime hybrid loans represent a relatively recent development in mortgage lending, and one with which many people have little or no firsthand experience. In addition, loan restructuring represents a significant departure from the standard servicing practices that are pursued under normal market conditions. For these and other reasons, a number of popular misconceptions have arisen with respect to this strategy which, it can be argued, do not necessarily hold up well in light of present facts.

Misconception: Restructuring is a bailout of subprime borrowers and/or investors.

The emergence of large financial sector losses sometimes results in the failure of depository institutions. In these cases, losses that would have been borne by insured depositors are covered by the FDIC Deposit Insurance Fund (DIF) under applicable laws and administrative rules. However, financial distress also often results in proposals for and against other types of ad-hoc government “bailouts” in the interest of financial stability. The critics of financial bailouts are generally correct; in the end bailouts usually end up benefiting one group at the expense of another and undermining market discipline on risk taking.

In this case, however, those criticisms do not apply for the following reason: this is in no way a government bailout. The proposal being discussed is one where servicers attempt to restructure loans on their own in the interest of investors. If successful, they will have implemented a shift in servicing strategy to the benefit of all interested parties. But in no case is there a subsidy, implicit or explicit, of investors or borrowers

that would result in cost-shifting or undermine market discipline. On the contrary, renegotiation of loan terms is a common private financial practice in times of distress; in this case the problem is convincing servicers that they have the legal flexibility to shift strategies and that doing so will improve the outcome for investors.

Misconception: Restructuring violates the contractual rights of investors.

Streamlined restructuring is a strategy that can be pursued voluntarily by servicers in the interest of investors under existing PSA agreements. The significant deterioration we have seen in mortgage credit performance and housing market conditions points to this strategy as a means to maximize the total net present value of securitized subprime mortgages. Given that this is the legal mandate of servicers, it is not surprising that they have begun to embrace this approach more often as conditions have worsened. But as long as this path is chosen voluntarily by servicers under their existing PSAs, and as long as they can demonstrate that their strategy is to maximize the proceeds of the pool, it is difficult to argue that doing so represents a violation of anyone’s contractual rights.

Misconception: Restructuring will create a windfall for subprime borrowers.

Some have expressed concern that restructuring subprime loans to a fixed percent of interest at the starter rate will result in a windfall for subprime borrowers. This misconception is based on the belief that the starter rates for these loans are similar to the low 1 to 2 percent “teaser” rates that were aggressively advertised for prime borrowers. In fact, of subprime hybrid mortgages originated in the first quarter of 2006, the average starter rate was 8.28 percent, which exceeded the weighted-average rate on subprime fixed-rate loans made in that same quarter (7.93 percent) and was well above rates paid on prime fixed-rate loans. Therefore, these subprime borrowers will continue to pay subprime rates even after restructuring.

Misconception: Restructuring will deny investors their expected return.

Another popular misconception is that restructuring will deny investors a considerable stream of interest payments that would rightfully accrue to them after the loans reset to the full contract rate. The reality is that very few hybrid borrowers actually remain in the pools after reset and pay the full contract rate. Among such loans made and securitized in 2003, only one in 30 is

still paying the full contract rate after just four years (see Chart 4).

The amount of additional interest income that accrues to investors after payment reset, the so-called *excess spread*, depends on the ability and willingness of borrowers to make monthly payments over the long term. However, the fact is that these loans generally were never designed or underwritten to perform at the full contract rate after reset. Among subprime hybrid loans made in 2006, nearly half had loan-to-value ratios above 90 percent, and more than half had monthly debt service-to-income ratios above 40 percent. About a quarter of these loans met both criteria.

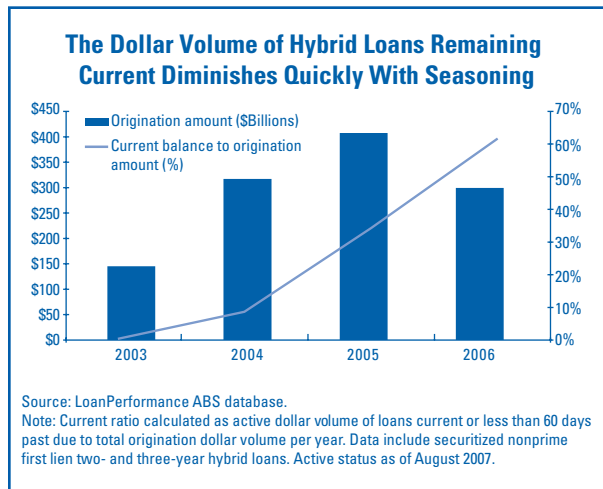
If these marginal borrowers cannot perform at the full contract rate on the loans, then what can lenders expect to recover in a short sale or a foreclosure? Studies show that foreclosure costs can run to more than half the loan amount.¹⁰ These loss rates are only going to rise in today's troubled housing markets, particularly if more subprime borrowers are pushed into foreclosure. Studies also show that foreclosures tend to drive down the value of nearby homes.¹¹ As these loans reset from the starter rate to the full contract rate, credit losses will mount as more borrowers default and enter foreclosure.

The basic math is this: given current conditions in housing and mortgage markets, as rates on these loans increase from the starter rate to the full contract rate, credit losses will rise faster than interest income. Thus, resets will be self-defeating for investors and will exert wider negative effects on local communities and the overall economy.

Misconception: Restructuring is unnecessary based on past levels of credit losses.

Some argue that based on past levels of credit losses, standardized and widespread restructuring of subprime hybrid ARMs is not needed at this time. However, previous experience with losses of subprime hybrid ARMs is a poor indicator of how these loans will perform going forward. For example, through August 2007, the cumulative default rate (CDR) for subprime hybrid loans origi-

Chart 4



nated in 2004 has been 10 percent; that is, of 1.6 million such loans originated that year, 162,000 have defaulted (see Table 2). However, these loans were made in a period of rapidly rising home prices in many parts of the country and underwent reset during a time of ready access to new subprime credit, making it relatively easy to repay 2004 vintage loans through refinancing or even the sale of the property.

By contrast, loans resetting today are doing so in an environment of declining home prices in many areas of the country and a virtual absence of private subprime lending. Of hybrid loans originated in 2006, the CDR already has reached 10.5 percent—before any of these loans have reset. Under today's market conditions, interest rate reset likely will drive the CDR to levels much higher than experienced on previous vintages. This means that the benefits of restructuring cannot be measured against credit losses of prior years. Rather, the benefits must be viewed in the context of how many borrowers can afford to pay at the full contract rate when refinancing options are extremely limited and the value of the property has declined or not increased as anticipated.

Conclusion

Poor underwriting and abuses in the subprime mortgage market are exerting a significant negative impact on the housing markets and the U.S. economy. In the coming months, large numbers of subprime ARMs will reset to higher interest rates, and hundreds of thousands of borrowers will face default and possible foreclosure. The traditional approach taken by mortgage servicers is to wait for default and then pursue foreclosure.

¹⁰ Karen Pence, "Foreclosing on Opportunity: State Laws and Mortgage Credit" (Federal Reserve Finance and Economics Discussion Paper 2003-16, May 13, 2003), p. 1.

¹¹ Dan Immergluck and Geoff Smith, "The External Costs of Foreclosure: The Impact of Single-Family Mortgage Foreclosures on Property Values," *Housing Policy Debate* (17:1) Fannie Mae Foundation (2006), www.fanniemae.org/programs/hpd/pdf/hpd_1701_immergluck.pdf.

Table 2

Performance of Two- and Three-Year Nonprime Hybrid Loans Has Deteriorated in Recent Vintages				
Originations and Cumulative Default Rates for 2- and 3-Year Nonprime First Lien Hybrid Loans as of August 2007*				
Origination Year	2003	2004	2005	2006
Total number of 2- and 3-year first lien hybrids originated	827,347	1,620,924	1,928,064	1,330,900
Cumulative number of defaulted loans	82,924	162,099	226,124	140,297
Number of loans currently in foreclosure, bankruptcy, or REO	19,629	71,438	155,837	124,739
As Percent of Loans Originated in Year				
Cumulative default rate	10.0%	10.0%	11.7%	10.5%
Percent currently in foreclosure, bankruptcy, or REO	2.4%	4.4%	8.1%	9.4%

*Default includes all loans which entered foreclosure, bankruptcy, or REO.
Source: LoanPerformance ABS database. Data for nonprime two- and three-year hybrids included in private label securitizations. Includes loans in subprime and Alt-A pools. Data current through August 2007.

While this may be the optimal approach for most loan types under normal market conditions, the large payment resets imposed on subprime hybrid borrowers will, in today's distressed housing market, require servicers to consider new strategies to limit credit losses and maximize the value of the mortgages they manage.

An emerging consensus suggests that a streamlined loan modification approach is not only feasible, but that it can reduce the cost and complexity of restructuring. On October 10, 2007, Secretary of the Treasury Henry M. Paulson, Jr., announced the formation of HOPE NOW, a private sector alliance of counselors, servicers, investors, and other mortgage market participants, that will maximize outreach efforts to homeowners in distress to help them stay in their homes

and will create a coordinated plan to aid as many homeowners as possible.¹² In addition, on November 20, 2007, the Governor of California announced he has reached an agreement with several large loan servicers, including Countrywide, GMAC, Litton, and HomEq, to streamline "fast-track" procedures to help keep more subprime borrowers in their homes.¹³ Developments such as these represent real progress on the part of the mortgage servicing industry in dealing with the ongoing mortgage credit crisis. They reflect a recognition of the benefits of restructuring and the potential costs of a business-as-usual approach to the problem. The ability of mortgage servicers to get ahead of the curve by embracing restructuring on a wider basis could, in the end, be one of the most important factors in limiting the depth and duration of the present mortgage credit crisis.

¹² For more information about the HOPE NOW alliance, see www.hopenow.com. The U.S. Department of the Treasury press release is available at <http://www.ustreas.gov/press/releases/hp599.htm>.

¹³ "Gov. Schwarzenegger Works with Lenders to Help Homeowners Avoid Foreclosure," November 20, 2007 (press release available at <http://gov.ca.gov/index.php?/press-release/8147>).

Feature Article:

Establishing Voluntary Excess Deposit Insurance: Results of the 2006 FDIC Study

Foreword

The Federal Deposit Insurance Corporation (FDIC) was required by the Federal Deposit Insurance Reform Conforming Amendments Act of 2005 (FDIRCAA) to study the feasibility and consequences of privatizing deposit insurance, establishing a voluntary deposit insurance system for deposits in excess of the maximum amount of FDIC insurance, and increasing the limit on deposit insurance coverage for municipalities and other units of general government. In February 2007, the FDIC sent its report to Congress. The results of the FDIC's findings on privatizing deposit insurance appeared in a previous issue of the *FDIC Quarterly* (available at <http://www.fdic.gov/bank/analytical/quarterly/index.html>).¹ This article summarizes the FDIC's findings on establishing a voluntary deposit insurance system for excess deposits. The results of the FDIC's study on providing for increased coverage on municipal deposits will be presented in a future issue of the *FDIC Quarterly*.

Introduction

In 2006, in response to the Federal Deposit Insurance Reform Conforming Amendments Act of 2005 (FDIRCAA), the FDIC studied the feasibility of establishing a voluntary deposit insurance system for deposits that exceed the maximum amount of FDIC insurance. This study concluded that market changes during the past two decades have lessened the demand for excess deposit insurance and provided depositors with other options to protect excess deposits. This article examines the factors that have shaped this new banking environment. It then looks at two approaches to offering excess deposit insurance and identifies key issues to be resolved should Congress authorize an FDIC role in the provision of excess deposit insurance.

¹ Christine Bradley and Valentine V. Craig, "Privatizing Deposit Insurance: Results of the 2006 FDIC Study," *FDIC Quarterly* (Second Quarter 2007): p. 23–32.

A Changed Banking Environment

The banking environment has changed considerably since the early 1990s in response to a return to banking industry profitability, technological advances, and product developments in the private sector. As a result, the demand for various forms of excess insurance has diminished.

The Banking Industry's Return to Stability and Profitability

The return to industry stability and profitability after the turbulence of the late 1980s and early 1990s has reduced the demand for private excess deposit insurance. A number of private excess deposit insurance plans were implemented in the early 1990s, but many—such as the Depositsure program, offered by Centrex Underwriters Inc.—have been terminated. Joseph Carlson, president of Memphis-based Centrex, stated that the company expected a "blizzard of applications" for excess deposit insurance when the program was created in 1993. However, when profitability returned to the banking sector, Centrex found that the demand for the product fell below original expectations, and the Depositsure program ceased operation in 2001.² Another entrant into this market, Reliance National, a subsidiary of Reliance Group Holdings, reported being "flooded with inquiries" in the late 1980s. However, by the time the company developed a product, it discovered that "their timing was a bit off."³

Examples of firms currently providing excess deposit insurance are BancInsure, St. Paul Travelers, and Kansas Bankers Surety Company. BancInsure provides risk management and risk mitigation services for community banks and other financial institutions and offers excess deposit insurance bonds to banks that are

² Celia Viggo Wexler, "For Private Deposit Insurers, The Windfall Never Came," *The American Banker* (July 10, 1996): p. 3.

³ *Ibid.*

customers for the company's other insurance products (<http://www.bancinsure.com>). St. Paul Travelers offers excess coverage through a depository bond (<http://www.travelers.com>), as does Kansas Bankers Surety Company, a subsidiary of Wesco Financial Corporation. Kansas Bankers Surety offers these bonds not only to banks in Kansas but to banks in many other states (<http://wescofinancial.com>).

In addition, excess deposit insurance continues to be provided to state-chartered cooperatives and savings banks in Massachusetts by the Share Insurance Fund of the Co-Operative Central Bank (SIF) for cooperative banks and the Depositors Insurance Fund (DIF) for savings banks. The SIF and DIF are private, industry-owned excess deposit insurance funds, and both are backed solely by their own assets. Neither the Commonwealth of Massachusetts nor the U.S. government has any liability for these funds' obligations. Both funds insure deposits above the FDIC limit, in full, dollar for dollar, without restriction (<http://coopcentralbank.com> or <http://difxs.com>).

Technological Advances

Recent technological advances have changed the banking environment by giving customers options for depositing their money and protecting their deposits, reducing the need for excess deposit insurance. No longer must depositors physically visit a depository institution to do their banking. Depositors can shop for financial services and conduct banking business through the Internet. Rates and terms for deposit accounts offered locally and nationwide are available through commercial listing services, such as Bankrate.com (<http://www.bankratemonitor.com>).⁴ The FDIC also has developed a Web-based application (<http://www2.fdic.gov/edie>) that provides information to depositors about how to keep more than \$100,000 fully insured within one financial institution, using different categories of account ownership.

Recent Private Sector Product Developments

Products developed by the private sector have reduced the demand for excess coverage. Two of these initiatives have become particularly popular: deposit-place-

ment services and deposit-sweep programs. In deposit-placement services, large deposits are split by private companies into smaller amounts and distributed to participating banks; as a result, the total deposit is insured by the FDIC. In deposit-sweep programs, a depository institution "sweeps" demand deposit accounts into nondeposit instruments, which may result in the avoidance of loss in the event of a bank failure.

Deposit-Placement Services. Deposit-placement services allow participating banks and thrifts to insure deposits that exceed the statutory insurance limit while retaining the bank-customer relationship with their depositors. To show how a deposit-placement service does this, let us assume that a customer deposits \$500,000 into a participating bank or thrift. The bank originating the deposit retains \$100,000 in an insured account and distributes the remaining \$400,000 among four other participating institutions, resulting in the depositor having full FDIC coverage.⁵ A deposit-placement service is a form of brokerage in which the risk associated with the increased coverage is passed to the FDIC. However, risk is minimized as deposits placed through this service are considered to be brokered deposits, and therefore only well-capitalized institutions can participate.⁶

In 2003, the FDIC responded to an inquiry from a deposit-placement service as to whether pass-through deposit insurance rules apply to funds placed with the service. The FDIC responded that deposit insurance would "pass through" from the agent (the deposit-placement service) to the owner of the funds provided that disclosure, record keeping, and other requirements were adhered to in the process.⁷ Deposit-placement services became an alternative for customers seeking deposit insurance coverage of funds in excess of the statutory limit.

⁵ This example illustrates a one-way sell transaction. Deposit-placement services also offer reciprocal transactions in which the money that is transferred out of the originating bank (\$400,000 in our example) is replaced with deposits from other participating institutions equaling (in our example) \$400,000. As a result of a reciprocating transfer, the originating bank maintains its deposit base.

⁶ 12 U.S.C. § 1831f(a) (2001). An adequately capitalized (but not well-capitalized) institution may apply to the FDIC for a waiver to accept brokered deposits ((12 U.S.C. § 1831f(c) (2001)).

⁷ Joseph A. DiNuzzo, "Do 'Pass Through' Deposit Insurance Rules Apply to Funds Placed in the 'Certificate of Deposit Account Registry Service?'" *FDIC Law, Regulations, Related Acts* (2003), <http://www.fdic.gov/regulations/laws/rules/4000-10220.html> (accessed December 1, 2006).

⁴ The FDIC provides tips for safe banking over the Internet at <http://www.fdic.gov/bank/individual/online/safe.html>, and maintains an online database where consumers can confirm that an institution is FDIC-insured (http://www2.fdic.gov/idasp/main_bankfind.asp).

Deposit-Sweep Programs. Many insured depository institutions offer customers the option of “sweeping” funds from a deposit account into an alternative investment vehicle. In a commercial sweep, the depositor has the option of sweeping funds held in a demand deposit into a variety of nondeposit instruments, including money market instruments, money market mutual funds, Eurodollar accounts, or international banking facilities. Commercial sweeps began to be used routinely in the 1980s. The primary motivation for developing this product was to allow commercial demand deposit customers to earn interest on their balances, but depositors may also believe their money is fully protected in the event of a bank failure. However, for several reasons, most sweeps may not actually increase a customer’s chance of recovery if the institution fails.

Options for Federal Excess Deposit Insurance Coverage

If Congress were to decide that the FDIC should play a role in providing excess deposit insurance, the FDIC could adopt one of two strategies. First, it could offer excess insurance directly to banks on a voluntary basis, subject to an additional cost, and either retain the additional risk not covered by the participating banks’ premiums or purchase reinsurance from a private sector reinsurer for the additional coverage. A second approach would be to continue to rely on the private sector for excess deposit insurance. However, to encourage private sector insurers to enter this market, the FDIC probably would have to act in some capacity as a reinsurer to private sector insurers.

FDIC Provision of Excess Deposit Insurance: Key Issues

The FDIC has considered how it might provide voluntary excess deposit insurance. Issues yet to be resolved include the availability of excess insurance, limits to the excess coverage to protect taxpayers and the insurance fund, and a price for the excess coverage. Congressional authorization would be required for the FDIC to play any role in providing excess voluntary deposit insurance.

Availability. The FDIC might limit the availability of excess deposit coverage to well-capitalized and well-managed institutions. For instance, it might institute term policies that would be cancelled if the institution

failed to meet requisite capital standards or if the institution’s CAMELS (capital adequacy, asset quality, management, earnings, liquidity and sensitivity to market risk) rating declined. A means of informing depositors about this change in status would need to be established to ensure that depositors received prompt and adequate notice.

Caps or Co-insurance. The FDIC might place a limit, or cap, on the amount of excess coverage it would insure. In addition, the depositor might share in any losses on the excess deposit. For example, only 80 percent of the excess deposit might be insured up to the designated cap. Of course, current law affects the recovery of excess (uninsured) deposits. First, after 1993 and the enactment of national depositor preference, uninsured depositors share *pro rata* with the FDIC in the liquidation of the failed bank.⁸ As a result, if only part of an excess deposit is insured in a system using caps or co-insurance, depositors may not receive more coverage than they would under the current system, although excess coverage would give depositors the certainty of at least a minimum recovery.⁹ Second, the FDIC Board may authorize the payment of advance dividends to uninsured depositors soon after a bank’s closing. Advance dividends are based on an estimated recovery of the bank’s assets and provide excess depositors an earlier return on the uninsured portion of their deposits.¹⁰

Pricing. A decision would need to be made as to whether participating institutions would pay a uniform premium. One possibility might be to assess a surcharge for accounts over the insurance limit on an increasing scale; that is, a higher premium per dollar of excess coverage. Another approach could be to assess a lower premium on the excess based on an institution’s asset mix.

⁸ 12 U.S.C. § 1821(d)(11) (2001).

⁹ This outcome would depend on the percentage of the excess deposit insured and the rate of return on assets to uninsured depositors at a given failed institution.

¹⁰ Federal Deposit Insurance Corporation (FDIC), *Managing the Crisis: The FDIC and RTC Experience, 1980–1994* (Washington, DC: FDIC, 1998): p. 249.

FDIC Provision of Excess Deposit Insurance: The Role of Reinsurance

The FDIC might guarantee its exposure in excess of the statutory limit with a private sector reinsurer. The FDIC would continue to provide deposit insurance coverage up to the statutory limit, but its risk on the excess could be transferred to a competitive market of private reinsurers.

The FDIC explored the feasibility of establishing a private reinsurance system for deposit insurance in 2001.¹¹ (The study focused on reinsurance of the FDIC's primary deposit insurance, not excess deposit insurance, but the findings are relevant here.) The Marsh & McLennan study found that reinsurers had only limited interest in engaging in reinsurance agreements with the FDIC on terms acceptable to the Corporation. Some reinsurers wished to limit their risk by either reinsuring only the strongest banks or charging prohibitively high premiums to banks which they determined to be involved in high-risk activities. Specifically, the Marsh & McLennan study reached the following conclusions:

- The capacity of the reinsurance market could theoretically exceed \$5 billion.¹² However, that capacity would be available only if all the major insurance companies or reinsurance companies participated and only for transactions that had a very low probability of loss.
- Reinsurance companies would operate to their maximum capacity only if the FDIC paid a very substantial first loss. Even if the FDIC took the first losses, reinsurers would provide maximum capacity only when the transaction was rated the equivalent of Aa/AA or Aaa/AAA. Multiline insurers expressed interest in higher-risk transactions (lower-risk transactions would not generate premiums sufficient to support underwriting costs), but the capacity of this segment of the market was limited—between \$200 million and \$500 million.

¹¹ The FDIC engaged Marsh & McLennan to evaluate the feasibility of private sector reinsurance arrangements, specifically whether such arrangements could provide competitive-market pricing information that would assist the FDIC in setting deposit insurance premiums and in measuring risks to the deposit insurance funds. The final report was completed in December 2001. See Marsh & McLennan Companies, *Reinsurance Feasibility Study* (Washington D.C.: FDIC 2001).

¹² Figures are not inflation adjusted.

- Reinsurers were not interested in sharing losses with the FDIC on a proportional basis, even if they received a proportional share of any premiums. Reinsurance companies advised the FDIC that if losses were shared on a proportional basis, their capacity would not exceed \$100 million.
- Existing transactions would affect a reinsurance company's decision to participate in other transactions. If a reinsurer had an existing credit exposure with a particular bank—in the form of bank debt, credit default swaps, or insurance, for instance—the reinsurer would likely limit any further transactions with that client. For this reason, most reinsurers would prefer a transaction that excluded, or substantially limited, coverage of the 100 to 150 largest banks.
- Reinsurers generally preferred not to be exposed to losses from the failure of any single large bank.
- Reinsurers would be more likely to participate if transactions were bundled and structured with a three- to five-year term because reinsurers felt better able to evaluate risk on a portfolio basis than on an individual bank-by-bank pricing basis. Similarly, reinsurers were uncomfortable assessing risk beyond a five-year horizon.
- Reinsurers' pricing of the FDIC's risk would be a function of many factors, including the risk of the transaction, reinsurers' cost of capital, reinsurers' expense and profit provisions, and supply and demand. Reinsurers' prices would represent a free market charge without government support and, as such, could be expected to exceed prices that the FDIC would charge for the same portion of coverage.¹³

Privately Underwritten Excess Deposit Insurance

As mentioned earlier in this article, a small number of private secondary insurers currently provide coverage for excess deposits with either the bank or the depositor purchasing the coverage. However, most banks and depositors have not taken advantage of these services. As suggested by the results of the Marsh & McLennan study, for privately underwritten excess deposit insurance to be more attractive to potential providers and customers, the FDIC likely would have to assume some

¹³ Marsh & McLennan Companies (2001).

of the risk. The small number of private businesses currently offering excess deposit insurance reinforces the hypothesis that some public loss-sharing arrangement is necessary to invigorate this market.

FDIC Loss-Sharing Protocol. If the FDIC were to act as a reinsurer of privately underwritten excess deposit insurance, it would need to determine how much risk it would assume. The most critical issue would be the interplay between the amount of risk the FDIC would retain in such a program and the pricing of excess coverage. The FDIC's share of risk could be minimal—perhaps, in the extreme, as little as 1 percent of anticipated expected losses—but that retained component would have to protect the private insurers from extreme events.

Summary

A return to stability and prosperity for the banking industry has weakened demand for excess deposit insurance. In addition, technological advances and private sector initiatives have changed the banking environment and provided depositors with many options for protecting their deposits in excess of the statutory limit. Banks and depositors currently can purchase private excess deposit insurance from a limited number of providers, and new banking products and services—

deposit-placement services and deposit-sweep programs—are alternatives to FDIC-provided excess deposit insurance.

If Congress were to decide that FDIC-provided excess insurance was appropriate, the FDIC would need to resolve availability, co-insurance, and pricing issues. It also would have to decide whether to retain the risk of the additional insurance or reinsure this exposure with private sector insurers. Alternatively, excess deposit insurance could be provided directly by private sector firms. However, depending on its scope, the price of privately provided excess deposit insurance likely would be prohibitive without an FDIC loss-sharing protocol. Private sector interest in providing excess deposit insurance, as reinsurers of FDIC exposure or as direct providers of excess deposit insurance, appears limited.

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REFERENCES

- Bradley, Christine and Valentine V. Craig. 2007. Privatizing Deposit Insurance: Results of the 2006 FDIC Study. *FDIC Quarterly*, Volume 1, Number 2.
- DiNuzzo, Joseph A. 2003. Do “Pass Through” Deposit Insurance Rules Apply to Funds Placed in the “Certificate of Deposit Account Registry Service?” *FDIC Law, Regulations, Related Acts*. <http://www.fdic.gov/regulations/laws/rules/4000-10220.html> (accessed December 1, 2006).
- Federal Deposit Insurance Corporation (FDIC). 1998. *Managing the Crisis: The FDIC and RTC Experience, 1980–1994*, p. 249.
- Marsh & McLennan Companies. 2001. *Reinsurance Feasibility Study*. Federal Deposit Insurance Corporation.
- Wexler, Celia Viggo. 1996. For Private Deposit Insurers, The Windfall Never Came. *The American Banker*. July 10: p. 3.