



September 26, 2013

TO: Public Comment File
FDIC Executive Secretary's Section
FDIC Legal Division

FROM: Robert F. Storch
Chief Accountant, FDIC
Chairman, FFIEC Task Force on Reports

SUBJECT: Meeting with Bank Trade Groups' Staff and Bankers on August 22, 2013 –
Proposed Agency Information Collection Activities;
Comment Request: February 21, 2013 (78 Federal Register 12141);
Comment Period Closing Date: April 22, 2013

On February 21, 2013, the FDIC, the OCC, and the Board (the agencies) published in the Federal Register a Joint Notice requesting comment on their Proposed Agency Information Collection Activities, i.e., proposed changes to the Consolidated Reports of Condition and Income (Call Report). The proposed Call Report revisions included, but were not limited to, new data items on the balances of consumer transaction accounts and nontransaction savings deposit accounts (for institutions with \$1 billion or more in total assets); a breakdown of service charges on consumer deposit accounts; information on international remittance transfers; and a list of all trade names that an institution uses to identify physical branches and internet websites that differ from the institution's legal title. These proposed revisions were originally proposed to take effect June 30, 2013. However, in a Federal Register notice published on May 23, 2013 (78 FR 30922), concerning final decisions reached on certain other Call Report changes included in the agencies' February 2013 proposal, the agencies stated that the latter two proposed changes mentioned above would take effect no earlier than December 31, 2013, and the other changes mentioned above would take effect no earlier than March 31, 2014.

At the request of the American Bankers Association (ABA), the FFIEC Task Force on Reports met on August 22, 2013, with staff from the ABA and the Consumer Bankers Association (CBA) and a number of bankers to discuss the February 2013 Call Report proposal on which the ABA and the CBA had jointly commented in April 2013, including the issue of collecting data in the Call Report for public policy purposes. Their other questions centered on four aspects of the proposal: reporting of trade names; consumer deposit account balances; the breakdown of service charges on consumer deposit accounts; and international remittance transfers. The trade groups and bankers raised concerns about the agencies' authority to collect data through the Call

Report related to policymaking rather than for the traditional purpose pertaining to the safety and soundness of insured depository institutions. The ABA along with others asked for clarification on the agencies' expectations for trade name reporting. They also expressed technical and operational concerns about the proposed reporting requirements for consumer deposit account-related information, including the expected costs and time involved in systems changes. The ABA inquired about the usefulness of the information on consumer deposit fees as requested in the February 2013 proposal. Finally, the ABA asked about the agencies' next steps for the proposal and the proposed implementation dates for these new reporting requirements.

Primary contributors to the discussion for the bank trade groups and bankers during the meeting were Richard Riese and Cecilia Calaby of the ABA, Amanda Freedle of Capital One, Daniel Meade of Wells Fargo, and Dale Johnson of United Bank. Primary contributors to the discussion for the Task Force and the agencies were Calvin Troup and this writer from the FDIC and Gary Stein and Rebecca Smullin from the CFPB.