

**From:** Ann Thomas [<mailto:athomas@thomasconsult.net>]  
**Sent:** Wednesday, January 02, 2019 12:14 PM  
**To:** Comments  
**Subject:** RIN 3064-AE91

*Question 3: The agencies invite comment on the proposed off-balance sheet qualifying criterion. What aspects of the off-balance sheet qualifying criterion, including definitions, require further clarity? For example, what aspects, if any, of the generally applicable capital requirement's definition of credit enhancing representations and warranties or the reporting instructions to Schedules RC-L of the Call Report or HC-L of Form FR Y-9C for securities lent and borrowed require further clarity? What other alternatives should the agencies consider for purposes of defining the proposed qualifying criterion? For example, what are the advantages and disadvantages of using off-balance sheet items reported on Schedules RC-L of the Call Report or HC-L of Form FR Y-9C in place of the off-balance sheet items as currently reported on Schedules RC-R of the Call Report or HC-R of Form FR Y-9C? What impact would the proposed qualifying criterion have on a banking organization's business strategies and lending decisions?*

**I would like to make one comment on the proposed rule in regard to question 3 above. I think it would be beneficial to reference the specific RCL line items that would be included in the 25% of assets limitation for off balance sheet line items. The wording in the proposed rule is not easy to understand, but if there was a worksheet to tie back to RCL or the related RCR line items, I think there would be less confusion and potentially fewer errors.**

**Thank you,**

*Ann Thomas  
Thomas Consulting*