

October 19, 2009

Mr. Herbert J. Messite
Counsel
Attn: Comments
Room F-1052
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

RE: *Federal Register* notice of August 19, 2009, for Consolidated Reports of Condition and Income (Call Report) (OMB Numbers: OCC: 1557-0081; Board: 7100-0036; FDIC: 3064-0052)

Dear Mr. Messite:

The Bureau of Economic Analysis (BEA) strongly supports the continued collection of data by the Federal Deposit Insurance Corporation on the Call Report. The data collected on these forms are crucial to key components of BEA's economic statistics.

BEA uses information from the Call Report to prepare the national income and product accounts, the international transactions accounts, the benchmark and annual input-output accounts, gross domestic product by industry, and gross state product. BEA supports the collection of additional data in the Call Report outlined in the *Federal Register* notice which includes, but is not limited to:

- New items identifying total other-than-temporary impairment losses on debt securities, the portion of the total recognized in other comprehensive income, and the net losses recognized in earnings;
- Breakdowns of the existing items for unused credit card lines and other unused commitments, with the former breakdown required only for certain institutions, and a related breakdown of the existing item for other loans;
- A breakdown of the existing item for time deposits of \$100,000 or more (in domestic offices);
- New items for the interest expense and quarterly averages for fully insured brokered time deposits and other brokered time deposits.

Additionally, the extension from annual to quarterly reporting on selected reports will be useful as BEA begins to develop quarterly industry estimates. Also, BEA uses charge-off information and information on non-accruing loans by category for research purposes. A detailed list of items used by BEA's various accounts are found in Attachment A.

Please keep BEA informed about any modifications to these forms. We are particularly interested in any modifications proposed during the forms' approval process that would substantially affect our use of these data. For additional information, please contact Ruth Bramblett, Source Data Coordinator, on 202-606-9653 or by e-mail at Ruth.Bramblett@bea.gov. Should you need assistance in justifying these forms to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,

/s/

Dennis J. Fixler
Chief Statistician

Attachment

ATTACHMENT A

Call Report Information Used by the Bureau of Economic Analysis

From the Consolidated Report of Condition and Income, data for fees and service charges, and on trust department earnings are used to estimate components of personal consumption expenditures in the gross domestic product (GDP), and in the benchmark input-output (I-O) to prepare estimates of input category controls for banks. The data for income, income taxes, cash dividends and provisions for losses are used to prepare estimates of corporate profits and net exports of financial services. Interest paid and received are used to prepare estimates of imputed service charges, net interest, and personal interest income in the national income and product accounts, benchmark and annual I-O accounts, and GDP by industry. Data on deposit holdings are used to allocate the imputed service charges of commercial banks to persons, to business, to government, and to the rest of the world. The specific schedules and items used are:

Schedule RI-Income Statement

1. Interest income:
 - a. Interest and fee income loans:
 - (1) In domestic offices:
 - (a) Loans secured by real estate
 1. Loans secured by 1- 4 family residential properties
 2. All other loans secured by real estate
 - (b) Loans to finance agricultural production and other loans to farmers
 - (c) Commercial and industrial loans
 - (d) Loans to individuals for household, family, and other personal expenditures:
 1. Credit Cards
 2. Other (includes single payment, installment, all student loans, and revolving credit plans other than credit cards)
 - (e) Loans to foreign governments and official institutions
 - (f) All other loans in domestic offices
 - (2) In foreign offices, Edge and Agreement subsidiaries, and IBFs
 - (3) Total interest and fee income on loans (sum of items 1.a.(1)(a) through 1.a.(2)

- b. Income from lease financing receivables
 - c. Interest income on balances due from depository institutions
 - d. Interest and divided income on securities:
 - (1) U.S. Treasury securities and U.S. Government agency obligations
(excluding mortgage-backed securities)
 - (2) Mortgage-backed securities
 - (3) All other securities (includes securities issued by state and political subdivisions in the U.S.)
 - e. Interest income from trading assets
 - f. Interest income on federal funds sold and securities purchased under agreements to resell
 - g. Other interest income
 - h. Total interest income (sum of items 1.a.(3) through 1.g)
2. Interest expense:
- a. Interest on deposits:
 - (1) Interest on deposits in domestic offices:
 - (a) Transaction accounts (NOW accounts, ATS accounts, and telephone and preauthorized transfer accounts)
 - (b) Non-transaction accounts:
 - (1) Saving deposits (includes MMDAs)
 - (2) Time deposits of \$100,000 or more
 - (3) Time deposits of less than \$100,000
 - (2) Interest on deposits in foreign offices, Edge Agreements subsidiaries, and IBFs
 - b. Expenses of federal funds purchased and securities sold under agreements to repurchase
 - c. Interest on trading liabilities and other borrowed money
 - d. Interest on subordinated notes and debentures
 - e. Total Interest expense (sum of items 2.a through 2.d)
4. Provision for loan and lease losses

5. Non-interest income:
 - a. Income from fiduciary activities
 - b. Service charges on deposit accounts in domestic offices
 - c. Trading revenue
 - d. (1) Fees and commissions from securities brokerages
(2) Investment banking, advisory, and underwriting fees and commissions
(3) Fees and commissions from annuity sales
(4) Underwriting income from insurance and reinsurance activities
(5) Income from other insurance activities
 - f. Net servicing fees
 - l. Other non-interest income
 - m. Total non-interest income (sum of items 5.a through 5.l)
7. Non-interest expense:
 - a. Salaries and employee benefits
 - b. Expenses of premises and fixed assets (net of rental income)
(excluding salaries and employee benefits and mortgage interest)
 - c. (1) Goodwill impairment losses
(2) Amortization expenses and impairment losses for other intangible assets
 - d. Other non-interest expense
 - e. Total non-interest expense (sum of items 7.a through 7.d)
9. Applicable income taxes (on item 8)
10. Income (loss) before extraordinary items and other adjustments (item 8 minus item 9)

Schedule RI-E Explanations

1. Other noninterest income (from Schedule RI, item 5.l.)
 - j. Bank card and credit card interchange fees
2. Other noninterest expense (from Schedule RI, item 7.d.)
 - k. Accounting and auditing expenses
 - l. Consulting and advisory expenses
 - m. Automated teller machine (ATM) and interchange expenses
 - n. Telecommunication expenses

Schedule RC-C Loans and Lease Financing Receivables

1. Loans secured by real estate
 - a. Construction, land development, and other land loans:
 - (1) 1 – 4 family residential construction loans
 - (2) Other construction loans and all land development and other land loans
 - b. Secured by farmland (including farm residential and other improvements)
 - c. Secured by 1 – 4 family residential properties:
 - (1) Revolving, open-end loans secured by 1 – 4 family residential properties and extended under lines of credit
 - (2) Closed-end loans secured by 1 – 4 family residential properties:
 - (a) Secured by first liens
 - (b) Secured by junior liens
 - d. Secured by multifamily (5 or more) residential properties
 - e. Secured by nonfarm nonresidential properties:
 - (1) Loans secured by owner-occupied nonfarm nonresidential properties
 - (2) Loans secured by other nonfarm nonresidential properties
2. Loans to depository institutions and acceptances of other banks:
 - a. To commercial banks in the U.S.
 - (1) To U.S. branches and agencies of foreign banks
 - (2) To other commercial banks in the U.S.
 - b. To other depository institutions in the U.S.
 - c. To banks in foreign countries
 - (1) To foreign branches of other U.S. banks
 - (2) To other banks in foreign countries
3. Loans to finance agricultural production and other loans to farmers
4. Commercial and industrial loans:
 - a. To U.S. addressees (domicile)
 - b. To non-U.S. addressees (domicile)
5. Not applicable
6. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper):
 - a. Credit cards

- b. Other revolving credit plans
- c. Other consumer loans (includes single payment, installment, and all student loans)
- 7. Loans to foreign governments and official institutions (including foreign central banks)
- 8. Obligations (other than securities and leases) of states and political subdivisions in the U.S.
- 9. Other loans
 - a. Loans for purchasing or carrying securities (secured and unsecured)
 - b. All other loans (exclude consumer loans)
- 10. Lease financing receivables (net of unearned income)
 - a. Leases to individuals for household, family, and other personal expenditures (i.e., consumer leases)
 - b. All other leases

Schedule RC-E Deposit Liabilities

Deposits of:

- 1. Individuals, partnerships, and corporations (include all certified and official checks. (Column A) (Total transaction accounts including, total demand deposits)
- 2. U.S. Government. (Column A) (Total transaction accounts, including total demand deposits)
- 3. States and political subdivisions in the U.S. (Column A) (Total transaction accounts, including total demand deposits)
- 5. Banks in foreign countries. (Column A) (Total transaction accounts, including total demand deposits)
- 6. Foreign governments and official institutions (including foreign central banks. (Column A) (Total transaction accounts, including total demand deposits)

Deposits of:

1. Individuals, partnerships, and corporations (include all certified and official checks.
(Column C) Total non-transaction accounts (including MMDAs)
2. U.S. Government. (Column C) Total non-transaction accounts (including MMDAs)
3. States and political subdivisions in the U.S. (Column C) Total non-transaction
accounts (including MMDAs)
5. Banks in foreign countries. (Column C) Total non-transaction accounts (including
MMDAs)
6. Foreign governments and official institutions (including foreign central banks).
(Column C) Total non-transaction accounts (including MMDAs)