



January 20, 2012

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: Conference Call Meeting with The Clearing House and its Member Banks on
January 4, 2012 – Proposed Agency Information Collection Activities;
Comment Request: November 21, 2011 (76 Federal Register 72035);
Comment Period Closing Date: January 20, 2012

On November 21, 2011, the FDIC, the OCC, and the Board 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 include new data on the composition of the allowance for loan and lease losses by major loan category and impairment measurement method, selected loan origination activity, mortgage loan representation and warranty reserves, past due and nonaccrual purchased credit-impaired loans, and savings association Qualified Thrift Lender test compliance; revised items for the leverage capital denominator to accommodate differences between the standards for banks and savings associations; and certain instructional revisions. The proposed revisions would take effect June 30, 2012, except for the final three, which would take effect March 31, 2012.

The Clearing House requested a conference call meeting with the FFIEC Task Force on Reports to ask questions about three aspects of the proposal: Schedule RI-C, Disaggregated Data for the Allowance for Loan and Lease Losses; Schedule RC-U, Loan Origination Activity (in Domestic Offices); and new items for mortgage loan representation and warranty reserves. Their questions pertained to the banking agencies' intended uses of these data and the objectives for the level of detail proposed to be collected. The Clearing House also asked about certain terminology used in the proposed schedules and the loan categories included therein. The Clearing House's questions centered primarily on the proposed loan origination schedule. In addition, The Clearing House inquired about the proposed June 30, 2012, implementation date for these new data.

Leading the discussion for The Clearing House during the conference call were David Wagner and Gail Haas of The Clearing House and Karen Nelson of Wells Fargo Bank. Leading the discussion for the Task Force were Gretchen Weinbach and William Bassett from the Federal Reserve Board and this writer.