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Subject: Call report and FFIEC 002 December 27, 2023 - Agency Information Collection Activities;

Comment Request (OMB 3064-0052; & 7100-0032)

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Subject: Call Report and FFIEC 002 Revision

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Agency Name: "OCC" and "1557-0081"

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An idea aiming to enhance loan data reporting to NDFIs is an important step in bringing attention to shadow banking activities. The provision of more details regarding loans to NDFIs through 88 FR 89489 would offer regulators greater insight into the activities of Non-Deposit Financial Institutions (NDFIs) and contribute to a more comprehensive understanding of the shadow banking sector. Here are key points to consider:

- Enhanced loan data reporting to NDFIs can provide regulators with an understanding of the lending activities and risk exposure within the shadow banking sector.
- Detailed loan data can support the identification of potential systemic risks associated with NDFIs, thereby paving the way for more targeted regulatory measures to address any emerging threats.
- Increased transparency in loan data reporting can help bridge the information gap surrounding NDFIs, providing regulators with the necessary tools to conduct more effective supervision of these entities.
- Access to comprehensive loan data about NDFIs supports the efforts to monitor credit trends, assess market conditions, and make informed decisions to safeguard financial stability.
- By raising awareness of the importance of enhanced loan data reporting to NDFIs, stakeholders can contribute to the broader discourse on shadow banking and its implications for the financial system, thus fostering a more proactive approach to regulatory oversight.

In conclusion, the proposal to enhance loan data reporting to NDFIs, as outlined in 88 FR 89489, represents a significant opportunity to shed light on the operations of shadow banking and bolster regulatory efforts to address potential vulnerabilities within the financial system. This initiative underscores the importance of fostering transparency and accountability within the shadow banking sector, ultimately contributing to a more resilient and well-monitored financial landscape.

Thank you for highlighting this critical aspect of regulatory oversight and financial data reporting.

Thank you for the opportunity to comment.

Higinio Jr. Sustaita