

FEDERAL RESERVE BANK OF NEW YORK

NEW YORK, N.Y. 10045-0001

AREA CODE 212-720-5000

January 21, 2009

To: The FR Y-6 Contact at the Addressed Bank Holding Company

The Board of Governors of the Federal Reserve System, under delegated authority from the Office of Management and Budget (OMB), has revised the Annual Report of Bank Holding Companies (FR Y-6). The final approved Federal Register Notice Volume 73, No. 162, dated August 20, 2008 describing the changes may be found on the Board's public web site listed below:

<http://www.federalreserve.gov/boarddocs/reportforms/review.cfm>

under the section entitled "Recently Approved and Implemented."

The FR Y-6 cover page and instructions were modified to highlight issues surrounding the submission of information on individuals. The Federal Reserve wants to avoid the release of sensitive, personally identifying information regarding individuals since copies of the FR Y-6 filings are frequently requested by the public.

The FR Y-6 reporting form collects details on individual shareholders and insiders of reporters. Reporters occasionally submit more information than is required (for example, personal home addresses, social security numbers, and extraneous commercial and financial information), and some of the details provided can be highly sensitive. Reporters rarely request confidential treatment for this information, even where it appears that the information could and should be withheld from disclosure under the Freedom of Information Act (FOIA), 5 U.S.C. § 552.

Reporters ultimately should take appropriate measures to safeguard the confidentiality of information they provide to the Federal Reserve, including details regarding individuals. In this context, it is incumbent upon reporters to request confidential treatment for information that may be subject to withholding under one or more of the FOIA exemptions from disclosure, in accordance with the Board's Rules Regarding Availability of Information (the Board's Rules), 12 CFR Part 261. The Federal Reserve will assume, in the absence of a request for confidential treatment submitted in accordance with the Board's Rules, that the reporter and the individual consent to public release of all details in the report concerning that individual.

The Federal Reserve expects reporters to ensure that they have the legal authority to provide information regarding individuals to the Federal Reserve and, on behalf of each individual, the authority to consent or object to public release of the information. The method of

January 21, 2009

obtaining an individual's consent and the adequacy of an individual's consent are legal issues to be resolved by the reporter. The Federal Reserve presumes legally adequate consent exists unless the reporter expressly represents otherwise.

The FR Y-6 report also includes the requirement to review and reconcile branch information for your organization. To facilitate your reporting of branch information, the Federal Reserve has provided a website, <http://structurelists.federalreserve.gov>, that reporters can use to download branch information in spreadsheet format for review, verification and, if necessary, correction. Please refer to the instructions on the website to assist you in accessing your organization's branch structure information. Changes should be made on the spreadsheet. The spreadsheet can then be emailed to ny.frb.branchinformation@ny.frb.org or sent in hardcopy to Violet Cumberbatch at the address below.

If you are unable to use the website and require a hardcopy listing of your branches for verification, or if you have difficulty with the email submission option, please contact Denoras Reid, Reports Analyst, Banking Structure Division at (212) 720-8843 or denoras.reid@ny.frb.org.

The revised reporting form and instructions may be accessed by selecting the FR Y-6 reporting form from the "Forms by number" pull-down menu at:

<http://www.federalreserve.gov/reportforms>

An RSSD Tiering Report for your organization is included to assist you with reviewing your information and preparing the FR Y-6 report. It is recommended that each reporter review its structure information on record for your organization prior to submitting the FR Y-6 report. This package also includes detailed instructions on how to address any discrepancies between your organization's information and the Tiering Report. The RSSD Tiering Report is generated from our database and depicts your company's organizational structure as of November 30, 2008. If your records differ from the tiering report, please file a Report of Changes in Organizational Structure (FR Y-10) if a change has not been reported or has been reported incorrectly. Alternatively, please contact us if we have recorded a previously reported event incorrectly. If you have reported organizational changes during December and you would like a tiering report as of December 31, 2008, please contact Marion Lauriello, Reports Analyst, at (212) 720-6526 by February 20, 2009.

The FR Y-6, including the submission of your branch listing, must be filed with the Federal Reserve Bank of New York no later than 90 calendar days after your bank holding company's fiscal year end. An original report and one copy of the completed FR Y-6 report must be submitted to:

January 21, 2009

Ms. Violet Cumberbatch, Staff Director
Banking Structure Division, 4th Floor
Statistics Function
Federal Reserve Bank of New York
33 Liberty Street
New York, NY 10045

Questions regarding the submission of the FR Y-6 should be directed to Marion Lauriello, Reports Analyst, at (212) 720-6526 or marion.lauriello@ny.frb.org or Judy Ekwughalu, Team Leader, at (212) 720-6760 or judy.ekwughalu@ny.frb.org.

Please sign the enclosed acknowledgement to confirm receipt of this letter and return the completed letter using one of the following methods:

- scan and then e-mail the enclosed acknowledgement letter to Shirley Whitmore at shirley.whitmore@ny.frb.org
- fax the acknowledgement letter to the attention of Shirley Whitmore at (212) 720-5028
- return the acknowledgment letter in the envelope provided

Sincerely yours,

Richard Molloy
Statistics Officer
Statistics Function

Enclosures: Acknowledgment letter and return envelope
RSSD Tiering Report Review Instructions for Bank Holding Companies
RSSD Tiering Report

cc: Authorized Officials of Bank Holding Companies (BHCs) (no enclosures)