FEDERAL RESERVE BANK *of* NEW YORK

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SCOTT SMENTEK
ASSISTANT VICE PRESIDENT

April 12, 2018

To: The Individuals Responsible for Preparing the Consolidated Financial Statements for Holding Companies (FR Y-9C) Located in the Second Federal Reserve District

Subject: Holding Companies (HCs) Reporting Requirements for March 31, 2018

The following report forms and instructions for the March 31, 2018 reporting date have been posted to the Federal Reserve Board's website at: http://www.federalreserve.gov/apps/reportforms/default.aspx under "Reporting Forms":

(1) Consolidated Financial Statements for Holding Companies (FR Y-9C);

(2) Parent Company Only Financial Statements for Large Holding Companies (FR Y-9LP);

(3) The Financial Statements of U.S. Nonbank Subsidiaries of U.S. Holding Companies (FR Y-11);

(4) The Financial Statements of Foreign Subsidiaries of U.S. Banking Organizations (FR 2314); and

(5) The Consolidated Holding Company Report of Equity Investments in Nonfinancial Companies (FR Y-12).

The final reporting forms and instructions for the FR Y-9C, FR Y-9LP, FR Y-11, FR 2314, and FR Y-12 effective for the March 31, 2018, reporting date were posted to the Board's public website at: https://www.federalreserve.gov/apps/reportforms/default.aspx

On January 22, 2018, the Federal Reserve published a final notice in the Federal Register[1] to implement a number of revisions to the FR Y-9C reporting requirements, most of which are consistent with recent changes to the Federal Financial Institutions Examination Council (FFIEC) Consolidated Reports of Condition and Income (Call Reports) (FFIEC 031 & 041; OMB No. 7100-0036).[2] Additionally, the Federal Reserve removed the concept of extraordinary items on various reports (FR Y-9LP, FR Y-11 and FR 2314); added one new item to the FR Y-9SP report[3] and revised the instructions to clarify the reporting of certain tax benefits on various reports. **These changes are effective March 31, 2018.** See Attachment 2 for a detailed list of changes impacting reporting requirements for **March 31, 2018.**

[1] See 83 Fed. Reg. 2985 (January 22, 2018).
[2] See 82 Fed. Reg. 2444 (January 9, 2017).
[3] Changes to the FR Y-9SP report will be reflected for the June 30, 2018 reporting date.

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On March 21, 2018, the Federal Reserve published a final notice in the Federal Register[4] to implement a number of revisions to the FR Y-9C reporting requirements which were also consistent with changes to the Federal Financial Institutions Examination Council (FFIEC) Consolidated Reports of Condition and Income (Call Reports) (FFIEC 031 & 041; OMB No. 7100-0036).[5] Additionally, the Federal Reserve revised reporting forms and instructions for the FR Y-9C, FR Y-9LP, and FR Y-9SP6 to implement accounting changes pertaining to equity securities under the Financial Accounting Standards Board's Accounting Standards Update (ASU) No. 2016-01, "Recognition and Measurement of Financial Assets and Financial Liabilities." **Modifications for equity securities are effective March 31, 2018, report date**. **All other changes are effective for June 30, 2018 report date.**

The reporting instructions on the FR Y-9C have also been updated to implement revisions for the regulatory capital transitions rulemaking which was published in November 2017 and took effect January 1, 2018. These instructional revisions retain certain regulatory capital transition provisions as they existed in 2017 for non-advanced approaches institutions. Additionally, the 250% risk-weight on Schedule HC-R Part II, Column K is now open for data items 2(b), 7, 8 and 11 and is applicable to advanced approaches holding companies and is not applicable to non-advanced approaches holding companies. **These changes are effective March 31, 2018.**

Interim guidance pertaining to the Accounting Standards Update (ASU) 2016-01, "Recognition and Measurement of Financial Assets and Financial Liabilities" for the FR Y-11 and FR 2314

In January of 2016, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) 2016-01, "Recognition and Measurement of Financial Assets and Financial Liabilities." In its summary of this ASU, the FASB described how one of the main provisions of the ASU differs from current U.S. generally accepted accounting principles (GAAP) as follows:

> The amendments in this Update supersede the guidance to classify equity securities with readily determinable fair values into different categories (that is, trading or available-for-sale) and require equity securities (including other ownership interests, such as partnerships, unincorporated joint ventures, and limited liability companies) to be measured at fair value with changes in the fair value recognized through net income. An entity's equity investments that are accounted for under the equity method of accounting or result in consolidation of an investee are not included within the scope of this Update.

For institutions that are public business entities, as defined in U.S. GAAP, ASU 2016-01 is effective for fiscal years beginning after December 31, 2017. For all other institutions, the ASU is effective for fiscal years beginning after December 31, 2018. Therefore, institutions that are public business entities must report their holdings of equity securities and other equity investments in accordance with the ASU within the existing structure of the FR Y-11 and FR 2314 beginning with the March 31, 2018, report date. <u>As a result, the Board is providing interim guidance for the March 31, 2018, report date advising institutions that have adopted the ASU on how to properly report equity securities</u>

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[4] <u>See</u> 83 Fed. Reg. 12395 (March 21, 2018).
[5] <u>See</u> 83 Fed. Reg. 939 (January 8, 2018).
[6] Changes to the FR Y-9SP report will be reflected for the June 30, 2018 reporting date.

and other equity investments within these reports. Please see the interim guidance below for each applicable report.

FR Y-11

(a) Report realized and unrealized holding gains (losses) on equity securities not held for trading in the appropriate sub item of either item 5 (noninterest income) or item 7 (noninterest expense) of Schedule IS (income statement), as applicable. In addition to realized and unrealized holding gains (losses) during the year-to-date reporting period on such equity investments with readily determinable fair values, institutions should also report in schedule IS, item 5 or 7, as applicable, the year-to-date carrying amounts of equity investments without readily determinable fair values not held for trading (i.e., unrealized holding gains (losses) for those measured at fair value through earnings, impairment, if any, plus or minus changes resulting from observable price changes for those equity investments for which this measurement election is made). For institutions that have adopted ASU 2016-01, schedule IS, item 6 (realized gains (losses) on securities not held in trading accounts) would only include realized gains (losses) on available-for-sale debt securities;

(b) measure holdings of equity securities and other equity investments without readily determinable fair values not held for trading in accordance with the ASU and continue to report them in schedule BS (balance sheet), item 7 (all other assets); and

(c) continue to report the historical cost and fair value of their holdings of equity securities with readily determinable fair values not held for trading as available-for-sale equity securities in schedule BS, item 2.b. (available for sale securities).

FR 2314

(a) Report realized and unrealized holding gains (losses) on equity securities not held for trading in the appropriate sub item of either item 5 (noninterest income) or item 7 (noninterest expense) of Schedule IS (income statement), as applicable. In addition to realized and unrealized holding gains (losses) during the year-to-date reporting period on such equity investments with readily determinable fair values, institutions should also report in schedule IS, item 5 or 7, as applicable, the year-to-date carrying amounts of equity investments without readily determinable fair values not held for trading (i.e., unrealized holding gains (losses) for those measured at fair value through earnings, impairment, if any, plus or minus changes resulting from observable price changes for those equity investments for which this measurement election is made). For institutions that have adopted ASU 2016-01, schedule IS, item 6 (realized gains (losses) on securities not held in trading accounts) would only include realized gains (losses) on available-for-sale debt securities;

(b) measure holdings of equity securities and other equity investments without readily determinable fair values not held for trading in accordance with the ASU and continue to report them in schedule BS (balance sheet), item 7 (all other assets); and

(c) continue to report the historical cost and fair value of their holdings of equity securities with readily determinable fair values not held for trading as available-for-sale equity securities in schedule BS, item 2.b. (available for sale securities).

Holding companies filing FR Y-9 reports (FR Y-9C, FR Y-9LP, FR Y-9SP, and the FR Y-9ES) are required to submit each report electronically. Holding companies must maintain in their files a manually signed and attested printout of the data submitted. The cover page of the Reserve Bank supplied report forms should be used to fulfill the signature and attestation requirement and this page should be attached to the printout placed in the bank holding company's files.

For institutions that submit the FR Y-11, FR 2314, and FR Y-12 reports electronically, a manually signed and attested printout of the data submitted must be maintained in their files. For institutions that do not choose to file this report electronically, the Federal Reserve will continue to accept paper copy submissions.

If you complete the preparation, editing, and review of your report(s) before the submission deadline, please file the report(s) immediately rather than waiting. Early submission provides for additional time for your institution to become accustomed with the new enhanced electronic submission process, and aids the Federal Reserve in the editing, review, and analysis of the reports. If you later find that certain information needs to be revised, please make the appropriate changes to your report and promptly submit the revised data.

The Federal Reserve developed Reporting Central to enhance the overall reporting functionality of the Federal Reserve Banks' data collection and processing activities. These enhancements will allow for a more secure, technically advanced, and efficient system that will encompass a single point of entry for electronic submission and file uploads. Financial and nonfinancial institutions will access Reporting Central via the FedLine® Web Access Solutions site to submit reports and gain access to electronic reporting applications, report forms, and instructions. Additional information about the Reporting Central application, including an online resource center, is available at: http://www.frbservices.org/centralbank/reportingcentral/index.html. If you have any questions regarding Reporting Central, please contact your Reporting and Reserves District Contact.

One aspect of the transition to Reporting Central necessitates the Federal Reserve to modify its internal procedures for handling confidentiality requests for those institutions that submit data electronically. Generally, individual respondent data collected on the FR Y-9C, FR Y-9LP and the FR Y-9SP are made readily available on the National Information Center public website (http://www.ffiec.gov/nicpubweb/nicweb/nichome.aspx) and the FR Y-9ES, FR Y-11/S, FR 2314/S and FR Y-12 reports are available to the public upon request on an individual basis. All data are published, with the exception of items deemed confidential per the report's instructions, unless the individual holding company from which the data were collected has been granted confidential treatment or has a request pending. A holding company may request confidential treatment for the entire report or for specific items on the report. To better facilitate confidentiality requests and ensure the data are properly handled during the review of the request, the Federal Reserve strongly encourages institutions that are of the opinion that disclosure of certain commercial or financial information in the report would likely result in substantial harm to its (or its subsidiaries') competitive position or that disclosure of the submitted personal information would result in unwarranted invasion of personal privacy to:

(1) notify their Reserve Bank of their intent to request confidential treatment in advance of the written request and

(2) send the confidentiality request in writing prior to data submission.

For institutions that do not submit data electronically, written requests for confidentiality may be provided concurrently with the paper submission of the report.

For more information on confidentiality requests, please see the specific report General Instructions. **Note:** The information referenced above pertains to the existing manual process for submitting confidentiality requests. The final notice to add the confidentiality check box to the front page of the FR Y-9C, FR Y-9LP, FR Y-9SP, FR Y-9ES, FR Y-11/S, FR 2314/S, and FR Y-12 forms was published in the Federal Register.[7] The implementation date for the new confidentiality check box procedures has not been determined. Institutions will be provided with ample notice so that they may prepare for submission of the new confidentiality check box requirements.

The Federal Reserve publishes holding company FR Y-9 report submissions on the internet at: http://www.ffiec.gov/nicpubweb/nicweb/nichome.aspx. Data is published on a flow basis within two days following receipt of a submission from the holding company, and updates are run nightly to capture any revisions subsequently submitted by the reporting institutions.

Institutions may subscribe to the Federal Reserve Board e-mail notification service to receive alerts regarding report form and instruction updates at: http://www.federalreserve.gov/reportforms/whats-new.htm. These updates include changes related to proposed new and existing data collections and final reporting forms and instructions.

Supplemental instructions concerning current accounting and reporting issues affecting the FR Y-9 series of reports are provided in Attachment 1. Note: The Supplemental instructions have been updated to include guidance and information on "Accounting and Reporting Implications of the New Tax Law" and the "Presentation of Net Benefit Cost in the Income Statement." Changes to data edits impacting the FR Y-9C for the March 31, 2018 report date are provided in a separate attachment. Changes to data edits impacting the FR Y-9LP, FR Y-11, and FR 2314 are included in Attachment 3.

Subscription Service

We offer a subscription service, which enables you to receive recent news and updates on our reporting forms and instructions and upcoming events. You can sign up for this service at the following website: http://service.govdelivery.com/service/subscribe.html?code=USFRBNEWYORK_8.

Institutions may subscribe to the Federal Reserve Board e-mail notification service to receive alerts regarding report form and instruction updates at: http://www.federalreserve.gov/reportforms/whats-new.htm. These updates include changes related to proposed new and existing data collections and final reporting forms and instructions.

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[7] 80 FR 52282 (August 28, 2015)

Website

Report forms and instructions for the FR Y-9C, FR Y-9LP, FR Y-11, FR 2314, and FR Y-12 are available on the Federal Reserve Board's web site at: http://www.federalreserve.gov/apps/reportforms/default.aspx under "Reporting Forms."

Reports Submission

The submission deadline for **FR Y-9C** filers is Thursday, May 10, 2018. Any **FR Y-9C** reports received after 5:00 p.m. on May 10, 2018 will be considered late. The submission deadline for **FR Y-9LP** filers is Tuesday, May 15, 2018. Any **FR Y-9LP** reports received after 5:00 p.m. on May 15, 2018 will be considered late. The submission deadline for **FR Y-11** and **FR 2314** filers is Wednesday, May 30, 2018. Any **FR Y-11** or **FR 2314** report received after 5:00 p.m. on May 30, 2018 will be considered late, unless postmarked by May 27, 2018 or sent by overnight service by May 29, 2018. The submission deadline for **FR Y-12** filers is Tuesday, May 15, 2018. Any **FR Y-12** reports received after 5:00 p.m. on May 15, 2018 will be considered late unless postmarked by May 12, 2018 or sent by overnight service by May 14, 2018.

Submission of initial data via facsimile, even if prior to this deadline does not constitute an official filing. In view of this, please be sure that completed reports are submitted on time to:

Federal Reserve Bank of New York
Data and Statistics Function
Administrative Support Staff
33 Liberty Street, 6th Floor
New York, NY 10045

Questions regarding these reports should be addressed to Molly Florio, Regulatory Data Manager, at (212) 720-8125.

Questions regarding the capital adequacy guidelines should be directed to Heidi Kim in the Supervision Policy & Strategy Group at (212) 720-6480.

Sincerely,

ATTACHMENT 1

Supplemental Instructions

Accounting and Reporting Implications of the New Tax Law

On January 18, 2018, the banking agencies issued an Interagency Statement on Accounting and Reporting Implications of the New Tax Law which was enacted on December 22, 2017, and is commonly known as the Tax Cuts and Jobs Act (the Act). U.S. GAAP requires the effect of changes in tax laws or rates to be recognized in the period in which the legislation is enacted. Thus, in accordance with Accounting Standards Codification (ASC) Topic 740, Income Taxes, the effects of the Act would be recorded in a holding company's FR Y-9C Report for December 31, 2017, because the Act was enacted before year-end 2017. Changes in deferred tax assets (DTAs) and deferred tax liabilities (DTLs) resulting from the Act's lower corporate income tax rate and other applicable provisions of the Act would be reflected in an institution's income tax expense in the period of enactment, i.e., the year-end 2017 FR Y-9C report. HCs should refer to the Interagency Statement for guidance on the remeasurement of DTAs and DTLs, assessing the need for valuation allowances for DTAs, the effect of the remeasurement of DTAs and DTLs on amounts recognized in accumulated other comprehensive income (AOCI), the use for FR Y-9C purposes of the measurement period approach described in the Securities and Exchange Commission's Staff Accounting Bulletin No. 118 and a related FASB Staff Q&A, and regulatory capital effects of the new tax law.

The Interagency Statement notes that the remeasurement of the DTA or DTL associated with an item reported in AOCI, such as unrealized gains (losses) on available-for-sale (AFS) securities, results in a disparity between the tax effect of the item included in AOCI and the amount recorded as a DTA or DTL for the tax effect of this item. However, when the new tax law was enacted, ASC Topic 740 did not specify how this disproportionate, or "stranded," tax effect should be resolved. The Interagency Statement reported that the FASB had approved issuing an Exposure Draft of a proposed Accounting Standards Update (ASU) that would allow reclassification of the disproportionate tax effect from AOCI to retained earnings in financial statements that had not yet been issued. The Interagency Statement advised institutions that they may apply the guidance proposed in the ASU to remedy the disproportionate tax effects of items reported in AOCI when preparing their Call Reports for December 31, 2017.

On February 18, 2018, the Financial Accounting Standards Board (FASB) issued ASU No. 2018-02, "Reclassification of Certain Tax Effects from Accumulated Other Comprehensive Income," which allows institutions to eliminate the stranded tax effects resulting from the Act by electing to reclassify these tax effects from AOCI to retained earnings. Thus, this reclassification is permitted, but not required. ASU 2018-02 is effective for all entities for fiscal years beginning after December 15, 2018, and interim periods within those fiscal years. Early adoption of the ASU is permitted, including in any interim period, as specified in the ASU. A holding company electing to reclassify its stranded tax effects for U.S. GAAP financial reporting purposes should also reclassify these stranded tax effects in the same period for FR Y-9C Report purposes. For additional information, institutions should refer to ASU

2018-02, which is available at http://www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176170041017&acceptedDisclaimer=true.

A holding company that elects to reclassify the disproportionate, or stranded, tax effects of items within AOCI to retained earnings should not report any amounts associated with this reclassification in the FR Y-9C Report Schedule HI-A, Changes in Bank Equity Capital, because the reclassification is between two accounts within the equity capital section of Schedule HC, Balance Sheet, and does not result in any change in the total amount of equity capital.

When discussing the regulatory capital effects of the new tax law, the Interagency Statement explains that temporary difference DTAs that could be realized through net operating loss (NOL) carrybacks are treated differently from those that could not be realized through NOL carrybacks (i.e., those for which realization depends on future taxable income) under the agencies' regulatory capital rules. These latter temporary differences DTAs are deducted from common equity tier 1 (CET1) capital if they exceed certain CET1 capital deduction thresholds. However, for tax years beginning on or after January 1, 2018, the Act generally removes the ability to use NOL carrybacks to recover federal income taxes paid in prior tax years. Thus, except as noted in the following sentence, for such tax years, the realization of all federal temporary difference DTAs will be dependent on future taxable income and these DTAs would be subject to the CET1 capital deduction thresholds. Nevertheless, consistent with current practice under the regulatory capital rules, when a holding company has paid federal income taxes for the current tax year, if all federal temporary differences were to fully reverse as of report date during the current tax year and create a hypothetical federal tax loss that would enable the institution to recover federal income taxes paid in the current tax year, the federal temporary difference DTAs that could be realized from this source may be treated as temporary difference DTAs realizable through NOL carrybacks as of the regulatory capital calculation date.

Presentation of Net Benefit Cost in the Income Statement

In March 2017, the FASB issued ASU No. 2017-07, "Improving the Presentation of Net Periodic Pension Cost and Net Periodic Postretirement Benefit Cost," which requires an employer to disaggregate the service cost component from the other components of the net benefit cost of defined benefit plans. In addition, the ASU requires these other cost components to be presented in the income statement separately from the service cost component, which must be reported with the other compensation costs arising during the reporting period.

For holding companies that are public business entities, as defined under U.S. GAAP, ASU 2017-07 is effective for fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. For holding companies that are not public business entities (i.e., that are private companies), the ASU is effective for fiscal years beginning after December 15, 2018, and interim periods beginning after December 15, 2019. Early adoption is permitted as described in the ASU. Refer to the Glossary entries for "public business entity" and "private company" in the FR Y-9C Report instructions for further information on these terms.

For FR Y-9C purposes, a holding company should apply the new standard prospectively to the cost components of net benefit cost as of the beginning of the fiscal year of adoption. The service cost component of net benefit cost should be reported in Schedule HI, item 7.a, "Salaries and employee benefits." The other cost components of net benefit cost should be reported in Schedule HI, item 7.d, "Other noninterest expense."

For additional information, institutions should refer to ASU 2017-07, which is available at http://www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176168888120&acceptedDisclaimer=true.

Credit Losses on Financial Instruments

In June 2016, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) No. 2016-13, "Measurement of Credit Losses on Financial Instruments," which introduces the current expected credit losses methodology (CECL) for estimating allowances for credit losses. Under CECL, the allowance for credit losses is a valuation account, measured as the difference between the financial assets' amortized cost basis and the net amount expected to be collected on the financial assets (i.e., lifetime credit losses). To estimate expected credit losses under CECL, holding companies will use a broader range of data than under existing U.S. generally accepted accounting principles (GAAP). These data include information about past events, current conditions, and reasonable and supportable forecasts relevant to assessing the collectability of the cash flows of financial assets.

The ASU is applicable to all financial instruments carried at amortized cost (including loans held for investment, net investment in leases, and held-to-maturity debt securities, as well as trade and reinsurance receivables and receivables that relate to repurchase agreements and securities lending agreements) and off-balance-sheet credit exposures not accounted for as insurance, including loan commitments, standby letters of credit, and financial guarantees. The new standard does not apply to trading assets, loans held for sale, financial assets for which the fair value option has been elected, or loans and receivables between entities under common control.

The ASU also modifies the treatment of credit impairment on available-for-sale (AFS) debt securities. Under the new standard, holding companies will recognize a credit loss on an AFS debt security through an allowance for credit losses, rather than the current practice required by U.S. GAAP of write-downs of individual securities for other-than-temporary impairment.

For holding companies that are public business entities and are also U.S. Securities and Exchange Commission (SEC) filers, as both terms are defined in U.S. GAAP, the ASU is effective for fiscal years beginning after December 15, 2019, including interim periods within those fiscal years. For public business entities that are not SEC filers, the ASU is effective for fiscal years beginning after December 15, 2020, including interim periods within those fiscal years. For holding companies that are not public business entities (i.e., that are private companies), the ASU is effective for fiscal years beginning after December 15, 2020, and for interim periods of fiscal years beginning after December 15, 2021. For all holding companies, early application of the new standard is permitted for fiscal years beginning after December 15, 2018, including interim periods within those fiscal years. Institutions must apply ASU 2016-13 for FR Y-9C purposes in accordance with the effective dates set forth in the ASU. A holding company that early adopts ASU 2016-13 for U.S. GAAP financial reporting purposes should also early adopt the ASU in the same period for FR Y-9C purposes.

The FR Y-9 forms and instructions will be revised to conform to the ASU at a future date, and the Federal Reserve will request comment on the proposed revisions through a Federal Register notice.

For additional information, institutions should refer to the agencies' Frequently Asked Questions on the New Accounting Standard on Financial Instruments – Credit Losses, which were most recently updated on September 6, 2017, the agencies' June 17, 2016, Joint Statement on the New Accounting Standard on Financial Instruments – Credit Losses, and ASU 2016-13, which is available at http://www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176168232528&acceptedDisclaimer=true.

Accounting for Hedging Activities

In August 2017, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) No. 2017-12, "Targeted Improvements to Accounting for Hedging Activities." This ASU amends Accounting Standards Codification (ASC) Topic 815, Derivatives and Hedging, to "better align an entity's risk management activities and financial reporting for hedging relationships through changes to both the designation and measurement guidance for qualifying hedging relationships and the presentation of hedge results."

For holding companies that are public business entities, as defined under U.S. generally accepted accounting principles (GAAP), the ASU is effective for fiscal years beginning after December 15, 2018, including interim periods within those fiscal years. For institutions that are not public business entities (i.e., that are private companies), the ASU is effective for fiscal years beginning after December 15, 2019, and interim periods beginning after December 15, 2020. Refer to the Glossary entries for "public business entity" and "private company" in the FR Y-9C instructions for further information on these terms.

Early application of the ASU is permitted for all holding companies in any interim period or fiscal year before the effective date of the ASU. Further, the ASU specifies transition requirements and offers transition elections for hedging relationships existing on the data of adoption (i.e., hedging relationships in which the hedging instrument has not expired, been sold, terminated, or exercised or for which the institution has not removed the designation of the hedging relationship). These transition requirements and elections should be applied on the date of adoption of the ASU and the effect of adoption should be reflected as of the beginning of the fiscal year of adoption (i.e., the initial application date). Thus, if a holding company early adopts the ASU in an interim period, any adjustments shall be reflected as of the beginning of the fiscal year that includes the interim period of adoption, e.g., as of January 1 for a calendar year institution. A holding company that early adopts ASU 2017-12 in an interim period for U.S. GAAP financial reporting purposes should also early adopt the ASU in the same period for FR Y-9C purposes.

The FR Y-9C instructions, including the Glossary entry for "Derivative Contracts," will be revised to conform to the ASU at a future date.

For additional information, holding companies should refer to ASU 2017-12, which is available at:
http://www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176169282347&acceptedDisclaimer=true.

Regulatory Capital Treatment of Certain Centrally-Cleared Derivative Contracts

On August 14, 2017, the banking agencies issued supervisory guidance on the regulatory capital treatment of certain centrally-cleared derivative contracts in light of recent changes to the rulebooks of certain central counterparties. Under the previous requirements of these central counterparties' rulebooks, variation margin transferred to cover the exposure that arises from marking cleared derivative contracts, and netting sets of such contracts, to fair value was considered collateral pledged by one party to the other, with title to the collateral remaining with the posting party. These derivative contracts are referred to as collateralized-to-market contracts. Under the revised rulebooks of certain central counterparties, variation margin for certain centrally-cleared derivative contracts, and certain netting sets of such contracts, is considered a settlement payment for the exposure that arises from marking these derivative contracts and netting sets to fair value, with title to the payment transferring to the receiving party. In these circumstances, the derivative contracts and netting sets are referred to as settled-to-market contracts.

Under the agencies' regulatory capital rules, in general, an institution must calculate the trade exposure amount for a cleared derivative contract, or a netting set of such contracts, by using the methodology described in section 34 of the rules to determine (i) the current credit exposure and (ii) the potential future exposure of the derivative contract or netting set of such contracts for purposes of the standardized approach risk-based capital calculation and the supplementary leverage ratio calculation. The risk-weighted asset calculations under the advanced approaches capital framework have similar requirements. Current credit exposure is determined by reference to the fair value of each derivative contract as measured under U.S. GAAP. Potential future exposure is determined, in part, by multiplying each derivative contract's notional principal amount by a conversion factor. The conversion factors vary by the category (for example, interest rate, equity) and remaining maturity of the derivative contract. The regulatory capital rules provide that, for a derivative contract that is structured such that on specified dates any outstanding exposure is settled and the terms are reset so that the fair value of the contract is zero, the remaining maturity equals the time until the next reset date.

For the purpose of the regulatory capital rules, the August 2017 supervisory guidance states that if, after accounting and legal analysis, an institution determines that (i) the variation margin payment on a centrally cleared settled-to-market contract settles any outstanding exposure on the contract, and (ii) the terms are reset so that the fair value of the contract is zero, the remaining maturity on such a contract would equal the time until the next exchange of variation margin on the contract. In conducting its legal analysis to determine whether variation margin may be considered settlement of outstanding exposure under the regulatory capital rules, an institution should evaluate whether the transferor of the variation margin has relinquished all legal claims to the variation margin and whether the payment of variation margin constitutes settlement under the central counterparty's rulebook, any other applicable agreements governing the derivative contract, and applicable law. Among other requirements, a central counterparty's rulebook may require an institution to satisfy additional obligations, such as payment of other expenses and fees, in order to recognize payment of variation margin as satisfying settlement under the rulebook. The legal and accounting analysis performed by the institution should take all such requirements into account.

Holding companies should refer to the supervisory guidance in its entirety for purposes of determining the appropriate regulatory capital treatment of settled-to-market contracts under the regulatory capital rules. This guidance is available at: https://www.fdic.gov/news/news/financial/2017/fil17033a.pdf.

Premium Amortization on Purchased Callable Debt Securities

In March 2017, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) No. 2017-08, "Premium Amortization on Purchased Callable Debt Securities." This ASU amends Accounting Standards Codification (ASC) Subtopic 310-20, Receivables – Nonrefundable Fees and Other Costs (formerly FASB Statement No. 91, "Accounting for Nonrefundable Fees and Costs Associated with Originating or Acquiring Loans and Initial Direct Costs of Leases"), by shortening the amortization period for premiums on callable debt securities that have explicit, non-contingent call features and are callable at fixed prices and on preset dates. Under existing U.S. generally accepted accounting principles (GAAP), the premium on such a callable debt security generally is required to be amortized as an adjustment of yield over the contractual life of the debt security. Under the ASU, the excess of the amortized cost basis of such a callable debt security over the amount repayable by the issuer at the earliest call date (i.e., the premium) must be amortized to the earliest call date (unless the institution applies the guidance in ASC Subtopic 310-20 that allows estimates of future principal prepayments to be considered in the effective yield calculation when the institution holds a large number of similar debt securities for which prepayments are probable and the timing and amount of the prepayments can be reasonably estimated). If the call option is not exercised at its earliest call date, the institution must reset the effective yield using the payment terms of the debt security.

The ASU does not change the accounting for debt securities held at a discount. The discount on such debt securities continues to be amortized to maturity (unless the Subtopic 310-20 guidance mentioned above is applied).

For holding companies that are public business entities, as defined under U.S. GAAP, the new standard is effective for fiscal years beginning after December 15, 2018, including interim periods within those fiscal years. For institutions that are not public business entities (i.e., that are private companies), the new standard is effective for fiscal years beginning after December 15, 2019, and interim periods within fiscal years beginning after December 15, 2020. Refer to the Glossary entries for "public business entity" and "private company" in the FR Y-9C instructions for further information on these terms.

Early application of the new standard is permitted for all holding companies, including adoption in an interim period of 2017 or a subsequent year before the applicable effective date for a holding company. If a holding company early adopts the ASU in an interim period, the cumulative-effect adjustment shall be reflected as of the beginning of the fiscal year of adoption.

A holding company must apply the new standard on a modified retrospective basis as of the beginning of the period of adoption. Under the modified retrospective method, a holding company should apply a cumulative-effect adjustment to affected accounts existing as of the beginning of the fiscal year the new standard is adopted. The cumulative-effect adjustment to retained earnings for this change in accounting principle should be reported in FR Y-9C Report Schedule HI-A, item 2.

For additional information, institutions should refer to ASU 2017-08, which is available at: http://www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176168934053&acceptedDisclaimer=true.

Recognition and Measurement of Financial Instruments: Investments in Equity Securities

In January 2016, the FASB issued ASU 2016-01, "Recognition and Measurement of Financial Assets and Financial Liabilities." This ASU makes targeted improvements to U.S. GAAP. As one of its main provisions, the ASU requires investments in equity securities, except those accounted for under the equity method and those that result in consolidation, to be measured at fair value with changes in fair value recognized in net income. Thus, the ASU eliminates the existing concept of available-for-sale (AFS) equity securities, which are measured at fair value with changes in fair value generally recognized in other comprehensive income. To be classified as AFS under current U.S. GAAP, an equity security must have a readily determinable fair value and not be held for trading. In addition, for an equity security that does not have a readily determinable fair value, the ASU permits an entity to elect to measure the security at cost minus impairment, if any, plus or minus changes resulting from observable price changes in orderly transactions for the identical or a similar investment of the same issuer. When this election is made for an equity security without a readily determinable fair value, the ASU simplifies the impairment assessment of such an investment by requiring a qualitative assessment to identify impairment.

The ASU's measurement guidance for investments in equity securities also applies to other ownership interests, such as interests in partnerships, unincorporated joint ventures, and limited liability companies. However, the measurement guidance does not apply to Federal Home Loan Bank and Federal Reserve Bank stock.

For holding companies that are public business entities, as defined under U.S. GAAP, ASU 2016-01 is effective for fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. For all other entities, the ASU is effective for fiscal years beginning after December 15, 2018, and interim periods within fiscal years beginning after December 15, 2019. Early application of the ASU is permitted for all holding companies that are not public business entities as of the fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. Holding companies must apply ASU 2016-01 for FR Y-9C purposes in accordance with the effective dates set forth in the ASU.

With the elimination of AFS equity securities upon a holding company's adoption of ASU 2016-01, the amount of net unrealized gains (losses) on these securities, net of tax effect, that is included in accumulated other comprehensive income (AOCI) on the FR Y-9C report balance sheet (Schedule HC, item 26(b)) as of the adoption date will be reclassified (transferred) from AOCI into the retained earnings component of equity capital on the balance sheet (Schedule HC, item 26(a)). Thereafter, changes in the fair value of (i.e., the unrealized gains and losses on) an holding company's equity securities that would have been classified as AFS under existing U.S. GAAP will be recognized through net income rather than other comprehensive income. For holding company's holdings of equity securities without readily determinable fair values as of the adoption date, the measurement provisions of the ASU are to be applied prospectively to these securities.

For additional information, institutions should refer to ASU 2016-01, which is available at: http://www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176167762170&acceptedDisclaimer=true.

Recognition and Measurement of Financial Instruments: Fair Value Option Liabilities

In addition to the changes in the accounting for equity securities discussed in the preceding section of these Supplemental Instructions, ASU No. 2016-01 requires a holding company to present separately in other comprehensive income (OCI) the portion of the total change in the fair value of a liability resulting from a change in the instrument-specific credit risk ("own credit risk") when the holding company has elected to measure the liability at fair value in accordance with the fair value option for financial instruments. Until a holding company adopts the own credit risk provisions of the ASU, U.S. GAAP requires the holding company to report the entire change in the fair value of a fair value option liability in earnings. The ASU does not apply to other financial liabilities measured at fair value, including derivatives. For these other financial liabilities, the effect of a change in an entity's own credit risk will continue to be reported in net income.

The change due to own credit risk, as described above, is the difference between the total change in fair value and the amount resulting from a change in a base market rate (e.g., a risk-free interest rate). A holding company may use another method that it believes results in a faithful measurement of the fair value change attributable to instrument-specific credit risk. However, it will have to apply the method consistently to each financial liability from period to period.

The effective dates of ASU 2016-01 are described in the preceding section of these Supplemental Instructions. Notwithstanding these effective dates, early application of the ASU's provisions regarding the presentation in OCI of changes due to own credit risk on fair value option liabilities is permitted for all holding companies for financial statements of fiscal years or interim periods that have not yet been issued or made available for issuance, and in the same period for FR Y-9C Report purposes.

When a holding company with a calendar year fiscal year adopts the own credit risk provisions of ASU 2016-01, the accumulated gains and losses as of the beginning of the fiscal year due to changes in the instrument-specific credit risk of fair value option liabilities, net of tax effect, are reclassified from Schedule HC, item 26(a), "Retained earnings," to Schedule HC, item 26(b), "Accumulated other comprehensive income" (AOCI). If a holding company with a calendar year fiscal year chooses to early apply the ASU's provisions for fair value option liabilities in an interim period after the first interim period of its fiscal year, any unrealized gains and losses due to changes in own credit risk and the related tax effects recognized in the FR Y-9C Report income statement during the interim period(s) before the interim period of adoption should be reclassified from earnings to OCI. In the FR Y-9C Report, this reclassification would be from Schedule HI, item 5.l, "Other noninterest income," and Schedule HI, item 9, "Applicable income taxes," to Schedule HI-A, item 12, "Other comprehensive income," with a corresponding reclassification from Schedule HC, item 26(a), to Schedule HC, item 26(b).

Additionally, for purposes of reporting on Schedule HC-R, Part I, holding companies should report in item 10.a, "Less: Unrealized net gain (loss) related to changes in the fair value of liabilities that are due to changes in own credit risk," the amount included in AOCI attributable to changes in the fair value of fair value option liabilities that are due to changes in the holding company's own credit risk. Holding companies should note that this AOCI amount is included in the amount reported in Schedule HC-R, Part I, item 3, "Accumulated other comprehensive income (AOCI)."

For additional information, institutions should refer to ASU 2016-01, which is available at: http://www.fasb.org/jsp/FASB/Document_C/DocumentPage?cid=1176167762170&acceptedDisclaimer=true.

New Revenue Recognition Accounting Standard

In May 2014, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) No. 2014-09, "Revenue from Contracts with Customers," which added Topic 606, Revenue from Contracts with Customers, to the Accounting Standards Codification (ASC). The core principle of Topic 606 is that an entity should recognize revenue at an amount that reflects the consideration to which it expects to be entitled in exchange for transferring goods or services to a customer as part of the entity's ordinary activities. ASU 2014-09 also added Topic 610, Other Income, to the ASC. Topic 610 applies to income recognition that is not within the scope of Topic 606, other Topics (such as Topic 840 on leases), or other revenue or income guidance. As discussed in the following section of these Supplemental Instructions, Topic 610 applies to a holding company's sales of repossessed nonfinancial assets, such as other real estate owned (OREO). The sale of repossessed nonfinancial assets is not considered an "ordinary activity" because holding companies do not typically invest in nonfinancial assets. ASU 2014-09 and subsequent amendments are collectively referred to herein as the "new standard."

The new standard specifically excludes financial instruments and other contractual rights or obligations within the scope of Topic 310, Receivables; Topic, 320, Investments – Debt and Equity Securities; Topic 815, Derivatives and Hedging; and certain other ASC Topics. Therefore, many common revenue streams in the financial sector, such as interest income, fair value adjustments, gains and losses on sale of financial instruments, and loan origination fees, are not within the scope of the new standard. The new standard may change the timing for the recognition of, and the presentation of any revenue streams within the scope of ASC Subtopic 606-10, such as certain fees associated with credit card arrangements, underwriting fees and costs, and deposit-related fees.

For holding companies that are public business entities, as defined under U.S. generally accepted accounting principles (GAAP), the new standard is effective for fiscal years beginning after December 15, 2017, including interim reporting periods within those fiscal years. For holding companies that are not public business entities (i.e., that are private companies), the new standard is effective for fiscal years beginning after December 15, 2018, and interim reporting periods within fiscal years beginning after December 15, 2019. Early application of the new standard is permitted for all holding companies for fiscal years beginning after December 15, 2016, and interim reporting periods as prescribed in the new standard. If a holding company chooses to early adopt the new standard for financial reporting purposes, the holding company should implement the new standard in its FR Y-9C for the same quarter-end report date.

For FR Y-9C purposes, a holding company must apply the new standard on a modified retrospective basis as of the effective date of the standard. Under the modified retrospective method, a holding company should apply a cumulative-effect adjustment to affected accounts existing as of the beginning of the fiscal year the new standard is adopted. The cumulative-effect adjustment to retained earnings for this change in accounting principle should be reported in the FR Y-9C Schedule HI-A, item 2. A holding company that early adopts the new standard must apply it in its entirety. The holding company cannot choose to apply the guidance to some revenue streams and not to others that are within the scope of the new standard.

For additional information, holding companies should refer to the new standard, which is available at: http://www.fasb.org/jsp/FASB/Page/SectionPage&cid=1176156316498.

Revenue Recognition: Accounting for Sales of OREO

As stated in the preceding section, Topic 610 applies to a holding company's sale of repossessed nonfinancial assets, such as OREO. When the new standard becomes effective at the dates discussed above, Topic 610 will eliminate the prescriptive criteria and methods for sale accounting and gain recognition for dispositions of OREO currently set forth in ASC Subtopic 360-20, Property, Plant, and Equipment – Real Estate Sales. Under the new standard, a holding company will recognize the entire gain, if any, and derecognize the OREO at the time of sale if the transaction meets the requirements of Topic 606. Otherwise, a holding company will record any payments received as a deposit liability to the buyer and continue reporting the OREO as an asset at the time of the transaction.

The following paragraphs highlight key aspects of Topic 610 that will apply to seller-financed sales of OREO once the new standard takes effect. When implementing the new standard, a holding company will need to exercise judgment in determining whether a contract (within the meaning of Topic 606) exists for the sale or transfer of OREO, whether the holding company has performed its obligations identified in the contract, and what the transaction price is for calculation of the amount of gain or loss. For additional information, please refer to the Glossary entry for "Foreclosed Assets" in the FR Y-9C instructions, which has been updated this quarter to incorporate guidance on the application of the new standard to sales of OREO.

Under Topic 610, a holding company's first step in assessing whether it can derecognize an OREO asset and recognize revenue upon the sale or transfer of the OREO is to determine whether a contract exists under the provisions of Topic 606. In order for a transaction to be a contract under Topic 606, it must meet five criteria. Although all five criteria require careful analysis for seller-financed sales of OREO, two criteria in particular may require significant judgment. These criteria are the commitment of the parties to the transaction to perform their respective obligations and the collectability of the transaction price. To evaluate whether a transaction meets the collectability criterion, a selling holding company must determine whether it is probable that it will collect substantially all of the consideration to which it is entitled in exchange for the transfer of the OREO, i.e., the transaction price. To make this determination, as well as the determination that the buyer of the OREO is committed to perform its obligations, a holding company should consider all facts and circumstances related to the buyer's ability and intent to pay the transaction price. As with the current accounting standards governing seller-financed sales of OREO, the amount and character of a buyer's initial equity in the property (typically the cash down payment) and recourse provisions remain important factors to evaluate. Other factors to consider may include, but are not limited to, the financing terms of the loan (including amortization and any balloon payment), the credit standing of the buyer, the cash flow from the property, and the selling holding company's continuing involvement with the property following the transaction.

If the five contract criteria in Topic 606 have not been met, the holding company may not derecognize the OREO asset or recognize revenue (gain or loss) as an accounting sale has not occurred. In contrast, if the holding company determines the contract criteria in Topic 606 have been met, it must then determine whether it has satisfied its performance obligations as identified in the contract by transferring control of the asset to the buyer, indicators of which are identified in the new standard. For seller-financed sales of OREO, the transfer of control generally occurs on the closing date of the sale when the holding company obtains the right to receive payment for the property and transfers legal title to the buyer. However, a holding company must consider all relevant facts and circumstances to determine whether control of the OREO has transferred.

When a contract exists and a holding company has transferred control of the asset, the holding company should derecognize the OREO asset and recognize a gain or loss for the difference between the transaction price and the carrying amount of the OREO asset. Generally, the transaction price in a sale of OREO will be the contract amount in the purchase/sale agreement, including for a seller-financed sale financed at market terms. However, the transaction price may differ from the amount stated in the contract due to the existence of below market terms on the financing. In this situation, the contract amount should be adjusted for the time value by using as the discount rate a market rate of interest considering the credit characteristics of the buyer and the terms of the financing.

As stated in the preceding section, for FR Y-9C purposes, holding companies must apply the new standard on a modified retrospective basis. To determine the cumulative-effect adjustment for the change in accounting for seller-financed OREO sales, holding companies should measure the impact of applying Topic 610 to the outstanding seller-financed sales of OREO currently accounted for under Subtopic 360-20 using the installment, cost recovery, reduced-profit, or deposit method as of the beginning of the fiscal year the new standard is adopted. The cumulative-effect adjustment to retained earnings for this change in accounting principle should be reported in FR Y-9C Schedule HI-A, item 2.

Accounting for Leases

In February 2016, the FASB issued ASU 2016-02, "Leases," which added ASU Topic 842, Leases. This guidance, once effective, supersedes ASC Topic 840, Leases.

Topic 842 does not fundamentally change lessor accounting; however, it aligns terminology between lessee and lessor accounting and brings key aspects of lessor accounting into alignment with the FASB's new revenue recognition guidance in ASC Topic 606. As a result, the classification difference between direct financing leases and sales-type leases for lessors moves from a risk-and-rewards principle to a transfer of control principle. Additionally, there is no longer a distinction in the treatment of real estate and non-real estate leases by lessors.

The most significant change that Topic 842 makes is to lessee accounting. Under existing accounting standards, lessees recognize lease assets and lease liabilities on the balance sheet for capital leases, but do not recognize operating leases on the balance sheet. The lessee accounting model under Topic 842 retains the distinction between operating leases and capital leases, which the new standard labels finance leases. However, the new standard requires lessees to record a right-of-use (ROU) asset and a lease liability on the balance sheet for operating leases. (For finance leases, a lessee's lease asset also is designated an ROU asset.) In general, the new standard permits a lessee to make an accounting policy election to exempt leases with a term of one year or less at their commencement date from on-balance sheet recognition. The lease term generally includes the noncancellable period of a lease as well as purchase options and renewal options reasonably certain to be exercised by the lessee, renewal options controlled by the lessor, and any other economic incentive for the lessee to extend the lease. An economic incentive may include a related-party commitment. When preparing to implement Topic 842, lessees will need to analyze their existing lease contracts to determine the entries to record on adoption of this new standard.

For a sale-leaseback transaction to qualify for sales treatment, Topic 842 requires certain criteria within Topic 606 to be met. Topic 606 focuses on the transfer of control of the leased asset from the seller/lessee to the buyer/lessor. A sale-leaseback transaction that does not transfer control is accounted for as a financing arrangement. For a transaction currently accounted for as a sale-leaseback under existing GAAP, an entity is not required to reassess whether the transaction would have qualified as a sale and a leaseback under Topic 842 when it adopts the new standard.

Leases classified as leveraged leases prior to the adoption of Topic 842 may continue to be accounted for under Topic 840 unless subsequently modified. Topic 842 eliminates leveraged lease accounting for leases that commence after an entity adopts the new accounting standard.

For holding companies that are public business entities, as defined by U.S. generally accepted accounting principles (GAAP), ASU 2016-02 is effective for fiscal years beginning after December 15, 2018, including interim reporting periods within those fiscal years. For holding companies that are not public business entities, the new standard is effective for fiscal years beginning after December 15, 2019, and interim reporting periods within fiscal years beginning after December 15, 2020. Early application of the new standard is permitted for all holding companies. A holding company that early adopts the new standard must apply it in its entirety to all lease-related transactions. If a holding company chooses to early adopt the new standard for financial reporting purposes, the holding company should implement the new standard in its FR Y-9C report for the same quarter-end report date.

For FR Y-9C purposes, a holding company must apply the new standard on a modified retrospective basis. Under the modified retrospective method, a holding company should apply a cumulative-effect adjustment to affected accounts existing as of the beginning of the fiscal year the new standard is adopted. The cumulative-effect adjustment to retained earnings for this change in accounting principle should be reported in Schedule HI-A, item 2. The ROU asset recorded upon adoption should be reflected in Schedule HC, item 6, "Premises and fixed assets" and the related lease liability recorded upon adoption should be reflected in Schedule HC-M, item 14, "Other borrowed money." These classifications are consistent with the current FR Y-9C instructions for reporting lessee capital leases.

For additional information on ASU 2016-02, holding companies should refer to the FASB's website at: http://www.fasb.org/cs/ContentServer?c=FASBContent_C&pagename=FASB%2FFASBContent_C%2FCompletedProjectPage&cid=1176167904031, which includes a link to the new accounting standard.

Classification and Measurement of Financial Instruments: Fair Value Option Liabilities

In January 2016 FASB completed its Classification and Measurement of Financial Instruments project by issuing ASU No. 2016-01, "Recognition and Measurement of Financial Assets and Financial Liabilities.

This ASU makes targeted improvements to U.S. generally accepted accounting principles (GAAP). It includes requiring a holding company to present separately in other comprehensive income (OCI) the portion of the total change in the fair value of a liability resulting from a change in the instrument-specific credit risk (own credit risk) when the holding company has elected to measure the liability at fair value in accordance with the fair value option for financial instruments. Prior to the new ASU, U.S. GAAP required holding companies to report the entire change in fair value of such an instrument in earnings. The effect of a change in an entity's own credit risk for other financial liabilities measured at fair value, including derivatives, will continue to be reported in net income.

The change due to own credit risk, as described above, is the difference between the total change in fair value and the amount resulting from a change in a base market rate (e.g., a risk-free interest rate). A holding company may use another method that it believes results in a faithful measurement of the fair value change attributable to instrument-specific credit risk. However, it will have to apply the method consistently to each financial liability from period to period.

For public business entities, as defined under U.S. GAAP, the ASU is effective for fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. For all other holding companies, the ASU is effective for fiscal years beginning after December 15, 2018, and interim periods within fiscal years beginning after December 15, 2019. Early application of the ASU is permitted for all holding companies that are not public business entities as of the fiscal years beginning after December 15, 2017, including interim periods within those fiscal years. Additionally, early application of the provisions regarding the presentation in OCI of changes due to own credit risk, as described above, is permitted for all holding companies for financial statements of fiscal years or interim periods that have not yet been issued or made available for issuance, and in the same period for FR Y-9C Report purposes.

When a holding company with a calendar year fiscal year adopts ASU 2016-01, the accumulated gains and losses as of the beginning of the fiscal year due to changes in the instrument-specific credit risk of fair value option liabilities, net of tax effect, are reclassified from Schedule HC, item 26(a), "Retained earnings," to Schedule HC, item 26(b), "Accumulated other comprehensive income" (AOCI). If a holding company with a calendar year fiscal year chooses to early apply the ASU's provisions for fair value option liabilities in an interim period after the first interim period of its fiscal year, any unrealized gains and losses due to changes in own credit risk and the related tax effects recognized in the FR Y-9C Report income statement during the interim period(s) before the interim period of adoption should be reclassified from Schedule RI, item 5(l), "Other noninterest income," and Schedule HI, item 9, "Applicable income taxes," to Schedule HI-A, item 12, "Other comprehensive income," with a corresponding reclassification from Schedule HC, item 26(a) to Schedule HC, item 26(b).

Additionally, for purposes of reporting on Schedule HC-R, Part I, holding companies should report in item 10(a), “Less: Unrealized net gain (loss) related to changes in the fair value of liabilities that are due to changes in own credit risk,” the amount included in AOCI attributable to changes in the fair value of fair value option liabilities that are due to changes in the holding company’s own credit risk. Holding companies should note that this AOCI amount is included in the amount reported in Schedule HC-R, Part I, item 3, “Accumulated other comprehensive income (AOCI).”

For additional information, holding companies should refer to ASU 2016-01, which is available at: http://www.fasb.org/jsp/FASB/Page/SectionPage&cid=1176156316498.

Accounting for Measurement-Period Adjustments Related to a Business Combination

In September 2015, FASB issued Accounting Standards Update ASU No. 2015-16, “Simplifying the Accounting for Measurement-Period Adjustments.” Under Accounting Standards Codification Topic 805, Business Combinations (formerly FASB Statement No. 141(R), “Business Combinations”), if the initial accounting for a business combination is incomplete by the end of the reporting period in which the combination occurs, the acquirer reports provisional amounts in its financial statements for the items for which the accounting is incomplete. During the measurement period, the acquirer is required to adjust the provisional amounts recognized at the acquisition date, with a corresponding adjustment to goodwill, to reflect new information obtained about facts and circumstances that existed as of the acquisition date that, if known, would have affected the measurement of the amounts recognized as of that date. At present under Topic 805, an acquirer is required to retrospectively adjust the provisional amounts recognized at the acquisition date to reflect the new information. To simplify the accounting for the adjustments made to provisional amounts, ASU 2015-16 eliminates the requirement to retrospectively account for the adjustments. Accordingly, the ASU amends Topic 805 to require an acquirer to recognize adjustments to provisional amounts that are identified during the measurement period in the reporting period in which adjustment amounts are determined. Under the ASU, the acquirer also must recognize in the financial statements for the same reporting period the effect on earnings, if any, resulting from the adjustments to the provisional amounts as if the accounting for the business combination had been completed as of the acquisition date.

In general, the measurement period in a business combination is the period after the acquisition date during which the acquirer may adjust provisional amounts reported for identifiable assets acquired, liabilities assumed, and consideration transferred for the acquiree for which the initial accounting for the business combination is incomplete at the end of the reporting period in which the combination occurs. Topic 805 provides additional guidance on the measurement period, which shall not exceed one year from the acquisition date, and adjustments to provisional amounts during this period.

For institutions that are public business entities, as defined under U.S. GAAP, ASU 2015-16 is effective for fiscal years, and interim periods within those fiscal years, beginning after December 15, 2015. For institutions that are not public business entities (i.e., that are private companies), the ASU is effective for fiscal years beginning after December 15, 2016, and interim periods within fiscal years beginning after December 15, 2017. The ASU’s amendments to Topic 805 should be applied prospectively to adjustments to provisional amounts that occur after the effective date of the ASU. Thus, holding companies with a calendar year fiscal year that are public business entities must apply the ASU to any adjustments to provisional amounts that occur after January 1, 2016, beginning with their FR Y-9C report for March 31, 2016. Holding companies with a calendar year fiscal year that are private companies must apply the ASU to any FR Y-9C Reports for December 31, 2017. Early application of ASU 2015-16 is permitted in FR Y-9C reports that have not been submitted.

For additional information, institutions should refer to ASU 2015-16, which is available at: http://www.fasb.org/jsp/FASB/Page/SectionPage&cid=1176156316498.

Other Reporting Matters

For the following topics, holding companies should continue to follow the guidance in the specified FR Y-9C Supplemental Instructions:

Reporting Exposures Hedged with Cleared Eligible Credit Derivatives in Schedule HC-R

Holding companies should continue to follow the guidance for Reporting Exposures Hedged with Cleared Eligible Credit Derivatives in Schedule HC-R that was included in the FR Y-9C Supplemental Instructions for December 2016. These instructions can be accessed via the Federal Reserve's website (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201612.pdf).

Disclosures for Investments in Certain Entities That Calculate Net Asset Value per Share

Holding companies should continue to follow the guidance for Disclosures for Investments in Certain Entities that Calculate Net Asset Value per share that was included in the FR Y-9C Supplemental Instructions for December 2016. These instructions can be accessed via the Federal Reserve's website (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201612.pdf).

Debt Issuance Cost

Holding companies should continue to follow the guidance for Debt Issuance Cost that was included in the FR Y-9C Supplemental Instructions for September 2016. These instructions can be accessed via the Federal Reserve's website (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201609.pdf).

Accounting for Subsequent Restructuring of a Troubled Debt Restructuring

Holding companies should continue to follow the guidance for Accounting for Subsequent Restructuring of a Troubled Debt Restructuring that was included in the FR Y-9C Supplemental Instructions for September 2016. These instructions can be accessed via the Federal Reserve's website (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201609.pdf).

Reclassification of Residential Real Estate Collateralized Consumer Mortgage Loans Upon a Foreclosure

Holding companies should continue to follow the guidance for Reclassification of Residential Real Estate Collateralized Consumer Mortgage Loans Upon a Foreclosure that was included in the FR Y-9C Supplemental Instructions for September 2016. These instructions can be accessed via the

Federal Reserve's website
(http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201609.pdf).

Reporting Certain Government-Guaranteed Mortgage Loans upon Foreclosure

Holding companies should continue to follow the guidance for Reporting Certain Government-Guaranteed Mortgage Loans upon Foreclosure that was included in the FR Y-9C Supplemental Instructions for September 2016. These instructions can be accessed via the Federal Reserve's website (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201609.pdf).

Secured Consumer Debt Discharged in a Chapter 7 Bankruptcy Order

Holding companies should continue to follow the guidance for Secured Consumer Debt Discharged in a Chapter 7 Bankruptcy Order that was included in the FR Y-9C Supplemental Instructions for December, 2015. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201512.pdf).

True Up Liability under an FDIC Loss-Sharing Agreement

Holding companies should continue to follow the guidance for True up liability under an FDIC loss-sharing agreement that was included in the FR Y-9C Supplemental Instructions for September, 2015. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201509.pdf).

Purchased Loans Originated by Others

Holding companies should continue to follow the guidance for purchased loans originated by others that was included in the FR Y-9C Supplemental Instructions for September, 2015. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201509.pdf).

Troubled Debt Restructurings, Current Market Interest Rates, and ASU No. 2011-02

Holding companies should continue to follow the guidance for troubled debt restructurings that was included in the FR Y-9C Supplemental Instructions for March 31, 2015. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201503.pdf).

Indemnification Assets and Accounting Standards Update No. 2012-06

Holding companies should continue to follow the guidance for indemnification assets that was included in the FR Y-9C Supplemental Instructions for June 30, 2014. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201406.pdf).

Determining the Fair Value of Derivatives

Holding companies should continue to follow the guidance in determining the fair value of derivatives that was included in the FR Y-9C Supplemental Instructions for June 30, 2014. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201406.pdf).

Other- Than- Temporary Impairment

Holding companies should continue to follow the guidance on reporting other-than- temporary-impairment that was included in the FR Y-9C Supplemental Instructions for June 30, 2014. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201406.pdf).

Reporting Defined Benefit Postretirement Plans

Holding companies should continue to follow the guidance regarding the reporting of defined benefit postretirement plans that was included in the FR Y-9C Supplemental Instructions for June 30, 2013. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201306.pdf).

Goodwill Impairment Testing

Holding companies should continue to follow the guidance regarding reporting related to goodwill impairment testing that was included in the FR Y-9C Supplemental Instructions for March 31, 2013. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201303.pdf).

Small Business Lending Fund

Holding companies should continue to follow the guidance regarding reporting related to the U.S. Treasury Department's Small Business Lending Fund (SBLF) that was included in the FR Y-9C Supplemental Instructions for March 31, 2013. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201303.pdf).

Treasury Department's Community Development Capital Initiative Program

Holding companies should continue to follow the guidance regarding reporting related to the Treasury Department's Community Development Capital Initiative Program that was included in the FR Y-9C Supplemental Instructions for September 30, 2012. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201209.pdf).

Reporting Purchased Subordinated Securities in Schedule HC-S

Holding companies should continue to follow the guidance on reporting purchased subordinated securities in Schedule HC-S that was included in the FR Y-9C Supplemental Instructions for September 30, 2011. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201109.pdf).

Consolidated Variable Interest Entities

Holding companies should continue to follow the guidance on reporting and accounting for consolidated variable interest entities that was included in the FR Y-9C Supplemental Instructions for September 30, 2011. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201109.pdf).

Treasury Department's Capital Purchase Program

Holding companies should continue to follow the guidance on accounting and reporting for the U.S. Treasury Department's Capital Purchase Program (CPP) under the Troubled Asset Relief Program mandated by the Emergency Economic Stabilization Act of 2008 that was included in the FR Y-9C Supplemental Instructions for September 30, 2011. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201109.pdf).

Accounting Standards Codification

A description of the adoption of FASB Statement No. 168, "The FASB Accounting Standards Codification™ and the Hierarchy of Generally Accepted Accounting Principles" was included in the FR Y-9C Supplemental Instructions for September 30, 2011. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201109.pdf).

Extended Net Operating Loss Carryback Period

Holding companies should continue to follow the guidance on accounting for the extended net operating loss carryback period under the Worker, Homeownership, and Business Assistance Act of 2009, that was included in the FR Y-9C Supplemental Instructions for December 31, 2010. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_201012.pdf).

FASB Interpretation No. 48 on Uncertain Tax Positions

Holding companies should continue to follow the guidance on accounting for uncertain tax positions under FASB Interpretation No. 48 that was included in the FR Y-9C Supplemental Instructions for December 31, 2009. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_200912.pdf).

Business Combinations and Noncontrolling (Minority) Interests

Holding companies should continue to follow the guidance on accounting for business combinations and noncontrolling (minority) interests under FASB Statements Nos. 141(R) and 160 that was included in the FR Y-9C Supplemental Instructions for September 30, 2009. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_200909.pdf).

Fair Value Measurement and Fair Value Option

Holding companies should continue to follow the guidance on fair value measurements under FASB Statement No. 157, *Fair Value Measurements*, and the guidance on implementing the fair value option under FASB Statement No. 159, *The Fair Value Option for Financial Assets and Financial Liabilities*, that was included in the FR Y-9C Supplemental Instructions for June 30, 2009. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_200906.pdf).

Accounting for Share-based Payments

Holding companies should continue to follow the guidance on accounting for share-based payments under FASB Statement No. 123 (Revised 2004), *Share-Based Payment* (FAS 123(R)), that was included in the FR Y-9C Supplemental Instructions for December 31, 2006. These instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI_FRY9_200612.pdf).

Tobacco Transition Payment Program

Holding companies should continue to follow guidance on the tobacco buyout program included in the FR Y-9C Supplemental Instructions for June 30, 2006, which can be accessed via the Federal Reserve's Web site

(http://www.federalreserve.gov/reportforms/supplemental/SI.FRY9.200606.pdf).

Commitments to Originate and Sell Mortgage Loans

Holding companies should continue to follow the guidance provided on this subject in the FR Y-9C Supplemental Instructions provided for December 31, 2005. These Supplemental Instructions can be accessed via the Federal Reserve's Web site (http://www.federalreserve.gov/reportforms/supplemental/SI.FRY9.200512.pdf).

ATTACHMENT 2

<u>Revisions to the FR Y-9C for March 31, 2018</u>

<u>Report Form and Instructions:</u>

(1) Revise report form and instructions to implement new accounting standard for equity securities;

(2) Revise the captions and instructions “Loans net of unearned income” and replace with “Loans held for investment”;

(3) Schedule HI, Memoranda data items 9(a) through 9(e). Raise the threshold from $2 million to $10 million on trading revenue from cash instruments and derivative instruments;

(4) Schedule HI, Memoranda item 10(a) and 10(b). Implement a $10 billion threshold on net gains (losses) recognized in earnings on credit derivatives that economically hedge credit exposures;

(5) Schedule HI-B, Part I data items 2(a) and 2(b). Delete data items pertaining to charge-offs and recoveries on loans and leases and changes in allowance for acceptances of U.S banks and other U.S. depository institutions;

(6) Schedule HC-C, Memoranda item 1. Add a control total for Total loans restructured that are in compliance with their modified terms;

(7) Schedule HC-M, data items 6(a)(2), 6(a)(3) and 6(a)(4) (a) through (c). Delete various loan related data items;

(8) Schedule HC-N, data item 9 and 10. Rename and reposition the existing control total from “Total” to “Total loans and leases” for consistency with the Call Report;

(9) Schedule HC-N, data item 12(b), 12(c), 12(d)(1) through (3). Delete various loan related data items and

(10) Schedule HC-N, Memoranda item 1. Add a control total, “Total loans restructured in troubled debt restructuring that are past due 30 days or more and in nonaccrual status”.

<u>Instructions only</u>

(1) Schedule HI, data item 9. Clarified the reporting of certain tax benefits and

(2) Schedule HC-R, Part I. Update instructions to implement revisions for the regulatory capital transitions rulemaking.

Revisions to the FR Y-9LP for March 31, 2018

Report Form and Instructions

(1) Revise report form and instructions to implement new accounting standard for equity securities;

(2) Revise the captions and instructions "Loans net of unearned income" and replace with "Loans held for investment;

(3) Removed "extraordinary items" per GAAP.

Instructions only

None

Revisions to the FR Y-11 for March 31, 2018

Report Form and Instructions

(1) Revise report form and instructions to implement new accounting standard for equity securities;

(2) Revise the captions and instructions "Loans net of unearned income" and replace with "Loans held for investment;

(3) Removed "extraordinary items" per GAAP.

Revisions to the FR 2314 for March 31, 2018

Report Form and Instructions

(1) Revise report form and instructions to implement new accounting standard for equity securities;

(2) Revise the captions and instructions "Loans net of unearned income" and replace with "Loans held for investment and

(3) Removed "extraordinary items" per GAAP.

Revisions to the FR Y-12 for March 31, 2018
Report Form

None

Instructions
None

ATTACHMENT 3

Summary of Edit Changes- FR Y-9LP Checklists
Effective as-of March 31, 2018

FR Y-9LP (most recent changes listed first by type of change, edit type, edit number)						
Date of	Type of	Affected Edit Information				Comments
Change	Change	Type	Number	Target Item	MDRM	
01/30/2018	Revised	Interseries	9281	PC-B17	BHCPHK02	
01/30/2018	Revised	Interseries	9285	PC-B17	BHCPHK02	
01/05/2018	Added	Quality	9090	PI-A(II)1a	BHCPHU25	
01/05/2018	Added	Interseries	9055	PI-3b	BHCPHT70	
01/05/2018	Revised	Validity	0420	PC-B11b	BHCP8517	
11/14/2017	Added	Quality	9050	PI-3a	BHCPHT69	
11/14/2017	Added	Validity	0200	PI-3c	BHCP4250	
11/14/2017	Revised	Quality	9060	PI-3c	BHCP4250	
11/14/2017	Revised	Quality	9060	PI-5	BHCPFT28	
11/14/2017	Revised	Validity	0195	PI-3a	BHCPHT69	
11/14/2017	Revised	Validity	0215	PI-6	BHCP0496	
11/14/2017	Revised	Validity	0315	PI-A(I)2h	BHCP3618	
11/14/2017	Ended	Quality	9080	PI-A(I)2d	BHCP3614	

Summary of Edit Changes - FR Y-11
Effective as-of March 31, 2018

FR Y-11 (most recent changes listed first by type of change, edit type, and edit number)						
Date of	Type of	Affected Edit Information				Comments
Change	Change	Type	Number	Target Item	MDRM	
12/12/2017	Revised	Quality	9050	IS-10	BHCSFT28	
12/12/2017	Revised	Validity	0210	IS-12	BHCS4340	

Summary of Edit Changes - FR 2314
Effective as-of March 31, 2018

FR 2314 (most recent changes listed first by type of change, edit type, and edit number)						
Date of	Type of	Affected Edit Information				Comments
Change	Change	Type	Number	Target Item	MDRM	
12/12/2017	Revised	Quality	9050	IS-10	SUBIFT28	
12/12/2017	Revised	Validity	0210	IS-12	SUBI4340	

Summary of Edit Changes- FR Y-9C Checklists
Effective as-of March 31, 2018

FR Y-9C (most recent changes listed first by type of change, edit type, edit number)						
Date of Change	**Type of Change**	**Type**	**Affected Edit Information: Number**	**Target Item**	**MDRM**	**Comments**
03/08/2018	**Revised**	**Intraseries**	**0156**	**HC-Q1A**	**BHCYJA36**	
03/08/2018	**Revised**	**Quality**	**0073**	**HC-Q13A**	**BHCKG805**	
03/08/2018	**Revised**	**Quality**	**9555**	**HC-Q1A**	**BHCYJA36**	
03/08/2018	**Revised**	**Validity**	**0142**	**HC-Q1A**	**BHCYJA36**	
03/08/2018	**Revised**	**Validity**	**0203**	**HC-Q7A**	**BHCKG502**	
03/08/2018	**Revised**	**Validity**	**0219**	**HC-Q1A**	**BHCYJA36**	
01/22/2018	Added	Quality	7847	HC-R(II)23K	BHCKS562	
01/22/2018	Added	Quality	7851	HC-R(II)25K	BHCKS573	
01/22/2018	Ended	Quality	6972	HC-R(II)2bB	BHCKS402	
01/22/2018	Revised	Intraseries	6757	HC-NM7	BHCKC410	
01/22/2018	Revised	Validity	2710	HC-H1	BHCK3197	
01/22/2018	Revised	Validity	3215	HC-N10C	BHCK3507	
01/12/2018	Added	Quality	7805	HC-R(II)2bK	BHCKH270	
01/12/2018	Added	Quality	7815	HC-R(II)7K	BHCKH289	
01/12/2018	Added	Quality	7817	HC-R(II)8K	BHCKH293	
01/12/2018	Added	Quality	7823	HC-R(II)11K	BHCKS504	
01/12/2018	Added	Quality	8230	HC-R(II)25K	BHCKS573	
01/12/2018	Added	Quality	9550	HC-R(II)2bK	BHCKH270	
01/12/2018	Added	Quality	9550	HC-R(II)7K	BHCKH289	
01/12/2018	Added	Quality	9550	HC-R(II)8K	BHCKH293	
01/12/2018	Added	Quality	9550	HC-R(II)11K	BHCKS504	
01/12/2018	Added	Validity	1031	HC-NM1gA	BHCKHK26	
01/12/2018	Added	Validity	1033	HC-NM1gB	BHCKHK27	
01/12/2018	Added	Validity	1035	HC-NM1gC	BHCKHK28	
01/12/2018	Revised	Quality	4130	HC-R(I)46a	BHCAH311	
01/12/2018	Revised	Validity	5500	HC-R(I)45	BHCAH036	
12/18/2017	Revised	Quality	6973	HC-R(II)2bB	BHCKS402	
12/18/2017	Revised	Validity	0204	HC-Q7B	BHCKG503	
12/18/2017	Revised	Validity	2070	HC-12	BHCK2170	
12/18/2017	Revised	Validity	3755	HC-2b	BHCK1773	
12/18/2017	Revised	Validity	3765	HC-R(II)2bA	BHCKJA21	
12/18/2017	Revised	Validity	3920	HC-R(II)11A	BHCT2170	
12/18/2017	Revised	Validity	5325	HC-R(II)m4	BHCKS624	
11/29/2017	Revised	Quality	5569	HI-B(II)Mem3	BHCKC390	
11/14/2017	Added	Intraseries	5117	HC-R(I)3a	BHCAP838	
11/14/2017	Added	Quality	9406	HC-CM1g	BHCKHK25	

FR Y-9C (most recent changes listed first by type of change, edit type, edit number)						
Date of Change	Type of Change	Type	Affected Edit Information Number	Target Item	MDRM	Comments
11/14/2017	Added	Quality	9520	HC-N9A	BHCK1406	
11/14/2017	Added	Quality	9520	HC-N9B	BHCK1407	
11/14/2017	Added	Quality	9520	HC-N9C	BHCK1403	
11/14/2017	Added	Quality	9520	HC-NM1gA	BHCKHK26	
11/14/2017	Added	Quality	9520	HC-NM1gB	BHCKHK27	
11/14/2017	Added	Quality	9520	HC-NM1gC	BHCKHK28	
11/14/2017	Added	Quality	9550	HC-R(II)11A	BHCT2170	
11/14/2017	Added	Quality	9550	HC-R(II)11C	BHCKD987	
11/14/2017	Added	Quality	9550	HC-R(II)11D	BHCKHJ90	
11/14/2017	Added	Quality	9550	HC-R(II)11E	BHCKHJ91	
11/14/2017	Added	Quality	9550	HC-R(II)11G	BHCKD988	
11/14/2017	Added	Quality	9550	HC-R(II)11H	BHCKD989	
11/14/2017	Added	Quality	9550	HC-R(II)11I	BHCKD990	
11/14/2017	Added	Quality	9550	HC-R(II)11J	BHCKS503	
11/14/2017	Added	Quality	9550	HC-R(II)11L	BHCKS505	
11/14/2017	Added	Quality	9550	HC-R(II)11M	BHCKS506	
11/14/2017	Added	Quality	9550	HC-R(II)11N	BHCKS507	
11/14/2017	Added	Quality	9550	HC-R(II)11Q	BHCKS510	
11/14/2017	Added	Quality	9550	HC-R(II)11R	BHCKH300	
11/14/2017	Added	Validity	0450	HC-CM1g	BHCKHK25	
11/14/2017	Added	Validity	1025	HC-N9A	BHCK1406	
11/14/2017	Added	Validity	1027	HC-N9B	BHCK1407	
11/14/2017	Added	Validity	1029	HC-N9C	BHCK1403	
11/14/2017	Added	Validity	1155	HI-8c	BHCK4301	
11/14/2017	Ended	Intraseries	0017	HI-B(I)2aA	BHCK4653	
11/14/2017	Ended	Intraseries	0018	HI-B(I)2aB	BHCK4663	
11/14/2017	Ended	Intraseries	0019	HI-B(I)2bA	BHCK4654	
11/14/2017	Ended	Intraseries	0020	HI-B(I)2bB	BHCK4664	
11/14/2017	Ended	Intraseries	0444	HC-N12bB	BHCKK073	
11/14/2017	Ended	Intraseries	0445	HC-N12cB	BHCKK076	
11/14/2017	Ended	Intraseries	0446	HC-N12d1B	BHCKK079	
11/14/2017	Ended	Intraseries	0447	HC-N12d2B	BHCKK082	
11/14/2017	Ended	Intraseries	0448	HC-N12d3B	BHCKK085	
11/14/2017	Ended	Quality	4126	HC-R(I)46a	BHCAH311	
11/14/2017	Ended	Quality	4131	HC-R(I)46a	BHCAH311	
11/14/2017	Ended	Quality	9480	HC-M6a2	BHCKK178	

FR Y-9C (most recent changes listed first by type of change, edit type, edit number)						
Date of	Type of		Affected Edit Information			Comments
Change	Change	Type	Number	Target Item	MDRM	
11/14/2017	Ended	Quality	9480	HC-M6a3	BHCKK179	
11/14/2017	Ended	Quality	9480	HC-M6a4a	BHCKK180	
11/14/2017	Ended	Quality	9480	HC-M6a4b	BHCKK181	
11/14/2017	Ended	Quality	9480	HC-M6a4c	BHCKK182	
11/14/2017	Ended	Quality	9520	HC-N10A	BHCK5524	
11/14/2017	Ended	Quality	9520	HC-N10B	BHCK5525	
11/14/2017	Ended	Quality	9520	HC-N10C	BHCK5526	
11/14/2017	Ended	Quality	9520	HC-N12bA	BHCKK072	
11/14/2017	Ended	Quality	9520	HC-N12bB	BHCKK073	
11/14/2017	Ended	Quality	9520	HC-N12bC	BHCKK074	
11/14/2017	Ended	Quality	9520	HC-N12cA	BHCKK075	
11/14/2017	Ended	Quality	9520	HC-N12cB	BHCKK076	
11/14/2017	Ended	Quality	9520	HC-N12cC	BHCKK077	
11/14/2017	Ended	Quality	9520	HC-N12d1A	BHCKK078	
11/14/2017	Ended	Quality	9520	HC-N12d1B	BHCKK079	
11/14/2017	Ended	Quality	9520	HC-N12d1C	BHCKK080	
11/14/2017	Ended	Quality	9520	HC-N12d2A	BHCKK081	
11/14/2017	Ended	Quality	9520	HC-N12d2B	BHCKK082	
11/14/2017	Ended	Quality	9520	HC-N12d2C	BHCKK083	
11/14/2017	Ended	Quality	9520	HC-N12d3A	BHCKK084	
11/14/2017	Ended	Quality	9520	HC-N12d3B	BHCKK085	
11/14/2017	Ended	Quality	9520	HC-N12d3C	BHCKK086	
11/14/2017	Ended	Validity	0258	HC-N12bA	BHCKK072	
11/14/2017	Ended	Validity	0259	HC-N12bB	BHCKK073	
11/14/2017	Ended	Validity	0260	HC-N12bC	BHCKK074	
11/14/2017	Ended	Validity	0261	HC-N12cA	BHCKK075	
11/14/2017	Ended	Validity	0262	HC-N12cB	BHCKK076	
11/14/2017	Ended	Validity	0263	HC-N12cC	BHCKK077	
11/14/2017	Ended	Validity	0264	HC-N12d1A	BHCKK078	
11/14/2017	Ended	Validity	0265	HC-N12d1B	BHCKK079	
11/14/2017	Ended	Validity	0266	HC-N12d1C	BHCKK080	
11/14/2017	Ended	Validity	0267	HC-N12d2A	BHCKK081	
11/14/2017	Ended	Validity	0268	HC-N12d2B	BHCKK082	
11/14/2017	Ended	Validity	0269	HC-N12d2C	BHCKK083	
11/14/2017	Ended	Validity	0270	HC-N12d3A	BHCKK084	
11/14/2017	Ended	Validity	0271	HC-N12d3B	BHCKK085	

FR Y-9C (most recent changes listed first by type of change, edit type, edit number)						
Date of Change	Type of Change	Type	Affected Edit Information Number	Target Item	MDRM	Comments
11/14/2017	Ended	Validity	0272	HC-N12d3C	BHCKK086	
11/14/2017	Ended	Validity	0326	HC-M6a2	BHCKK178	
11/14/2017	Ended	Validity	0327	HC-M6a3	BHCKK179	
11/14/2017	Ended	Validity	0328	HC-M6a4a	BHCKK180	
11/14/2017	Ended	Validity	0329	HC-M6a4b	BHCKK181	
11/14/2017	Ended	Validity	0330	HC-M6a4c	BHCKK182	
11/14/2017	Ended	Validity	0341	HC-M6a2	BHCKK178	
11/14/2017	Ended	Validity	0342	HC-M6a3	BHCKK179	
11/14/2017	Ended	Validity	0343	HC-M6a4a	BHCKK180	
11/14/2017	Ended	Validity	0344	HC-M6a4b	BHCKK181	
11/14/2017	Ended	Validity	0345	HC-M6a4c	BHCKK182	
11/14/2017	Ended	Validity	3230	HC-N10A	BHCK5524	
11/14/2017	Ended	Validity	3240	HC-N10B	BHCK5525	
11/14/2017	Ended	Validity	3255	HC-N10C	BHCK5526	
11/14/2017	Ended	Validity	5117	HC-R(I)3a	BHCAP838	
11/14/2017	Revised	Intraseries	0053	HC-P5b	BHDMF560	
11/14/2017	Revised	Intraseries	5371	HI-Mem9e	BHCKF186	
11/14/2017	Revised	Intraseries	6667	HC-N10C	BHCK3507	
11/14/2017	Revised	Intraseries	6756	HC-N10C	BHCK3507	
11/14/2017	Revised	Quality	0052	HC-P5b	BHDMF560	
11/14/2017	Revised	Quality	0433	HC-N12fA	BHCKK102	
11/14/2017	Revised	Quality	0434	HC-N12fB	BHCKK103	
11/14/2017	Revised	Quality	0435	HC-N12fC	BHCKK104	
11/14/2017	Revised	Quality	0546	HC-N12eB	BHCKK088	
11/14/2017	Revised	Quality	4016	HC-R(I)3	BHCAB530	
11/14/2017	Revised	Quality	4030	HC-R(I)7	BHCAP842	
11/14/2017	Revised	Quality	4125	HC-R(I)46a	BHCAH311	
11/14/2017	Revised	Quality	4137	HC-R(I)47	BHCAH313	
11/14/2017	Revised	Quality	5216	HI-Mem2	BHCK4592	
11/14/2017	Revised	Quality	5218	HI-Mem2	BHCK4592	
11/14/2017	Revised	Quality	6663	HC-N10A	BHCK3505	
11/14/2017	Revised	Quality	6664	HC-N10B	BHCK3506	
11/14/2017	Revised	Quality	6666	HC-N10C	BHCK3507	
11/14/2017	Revised	Quality	6941	HC-R(II)18aS	BHCKH304	
11/14/2017	Revised	Quality	9200	HI-Mem10a	BHCKC889	
11/14/2017	Revised	Quality	9200	HI-Mem10b	BHCKC890	

FR Y-9C (most recent changes listed first by type of change, edit type, edit number)						
Date of Change	Type of Change	Type	Affected Edit Information Number	Target Item	MDRM	Comments
11/14/2017	Revised	Quality	9520	HC-N10A	BHCK3505	
11/14/2017	Revised	Quality	9520	HC-N10B	BHCK3506	
11/14/2017	Revised	Quality	9520	HC-N10C	BHCK3507	
11/14/2017	Revised	Validity	0222	HC-M6a5	BHCKK183	
11/14/2017	Revised	Validity	0273	HC-N12eA	BHCKK087	
11/14/2017	Revised	Validity	0274	HC-N12eB	BHCKK088	
11/14/2017	Revised	Validity	0275	HC-N12eC	BHCKK089	
11/14/2017	Revised	Validity	0276	HC-N12fA	BHCKK102	
11/14/2017	Revised	Validity	0277	HC-N12fB	BHCKK103	
11/14/2017	Revised	Validity	0278	HC-N12fC	BHCKK104	
11/14/2017	Revised	Validity	0346	HC-M6a5	BHCKK183	
11/14/2017	Revised	Validity	1150	HI-8a	BHCKHT69	
11/14/2017	Revised	Validity	1170	HI-10	BHCK4300	
11/14/2017	Revised	Validity	1274	HI-Mem9e	BHCKF186	
11/14/2017	Revised	Validity	1276	HI-Mem9e	BHCKF186	
11/14/2017	Revised	Validity	1277	HI-Mem9e	BHCKF186	
11/14/2017	Revised	Validity	1278	HI-Mem9e	BHCKF186	
11/14/2017	Revised	Validity	1600	HI-B(I)9A	BHCK4635	
11/14/2017	Revised	Validity	1620	HI-B(I)9B	BHCK4605	
11/14/2017	Revised	Validity	2250	HC-BM2c	BHCK0387	