FEDERAL RESERVE BANK *of* NEW YORK

33 LIBERTY STREET, NEW YORK, NY 10045-0001

SCOTT SMENTEK
ASSISTANT VICE PRESIDENT

July 10, 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 June 30, 2018

The following report forms and instructions for the June 30, 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) Parent Company Only Financial Statements for Small Holding Companies (FR Y-9SP);

(4) The Financial Statements of U.S. Nonbank Subsidiaries Held by Foreign Banking Organizations (FR Y-7N);

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

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

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

The final reporting forms and instructions for the FR Y-9SP effective for the June 30, 2018 reporting date were posted to the Board's public website at https://www.federalreserve.gov/apps/reportforms/default.aspx. The final reporting forms and

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instructions for the FR Y-9C, FR Y-7N, FR Y-11 and the FR 2314 will be posted to the Board's public website at a later date. There were no changes to the FR Y-9LP or FR Y-12 for June 30, 2018.

FR Y-9C, FR-Y-9LP and the FR Y-9SP

On March 21, 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 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).[2] The reporting forms and instructions for the FR Y-9C have been updated to incorporate these changes. The changes include:

- Deleting and combining of certain data items pertaining to (1) Goodwill and Other intangible assets from Schedule HC, Balance Sheet; (2) U.S Government agency obligations and structured financial products from Schedule HC-B, Securities; (3) Structured financial products and certain loans and the unpaid principal balance of such loans on Schedule HC-D, Trading Assets; (4) Certain over-the counter derivatives on Schedule HC-L, Derivatives and Off-Balance sheet items, and (5) Purchased credit card relationships and nonmortgage servicing assets from Schedule HC-M, Memoranda;
- Deleting two preprinted captions for other noninterest income on Schedule HI, Income Statement and certain data items on Schedule HC-D, Trading Assets and Liabilities;
- Deleting Column B (Domestic Office) from Schedule HC-D, Trading Assets and Liabilities;
- Reducing the reporting frequency from quarterly to semiannual and from quarterly to annual for certain data items on the FR Y-9C report;
- Increasing and adding reporting thresholds for certain data items in four FR Y-9C schedules and
- Moving the reporting of "Goodwill" from Schedule HC to Schedule HC-M, Memoranda.

The FR Y-9SP report form and instructions were updated to:

- Incorporate the accounting changes for equity securities (ASU 2016-01);
- Add one new data item, "Discontinued Operations, Net of Applicable Income

[1] See 83 Fed. Reg. 12395 (March 21, 2018).
[2] See 83 Fed. Reg. 939 (January 8, 2018).

Taxes" to better align the reporting with the FR Y-9 family of reports;[3]

- Replace report form captions and instructions that reference "Loans net of unearned income" with "Loans held for investment" and
- Revise instructions for certain tax benefits.

There were no changes to the FR Y-9LP report for June 30, 2018.

On April 30, 2018, the Federal Reserve requested comment on proposed revisions to the FR Y-9C [4] consistent with the changes to the Consolidated Reports of Condition and Income (Call Reports)[5]. The comment period for the proposal ended June 29, 2018. The proposed changes include:

- Combining certain data items into new or existing data items pertaining to (1) Interest-only strips on Schedule HC-F – Other Assets; (2) Certain 1-4 family residential mortgage banking activities on Schedule HC-P; (3) Loans measured at fair value and the unpaid principal balances of such loans on HC-Q – Memoranda; (4) Certain types of credit exposures, ownership interests, credit exposures to securitization facilities sponsored by HCs, and transactions involving small business obligations on Schedule HC-S; (5) Certain detail on Schedule HC-V – Variable Interest Entities (VIEs), on consolidated VIEs used as asset-backed commercial paper (ABCP) conduits and certain detail on other VIEs;
- Deleting certain data items on Schedules HC-N – Past Due and Nonaccrual Loans, Leases, and Other Assets; HC-P – 1-4 Family Residential Mortgage Banking Activities in Domestic Offices; HC-Q – Assets and Liabilities Measured at Fair Value on a Recurring Basis-Memoranda; and HC-S – Servicing, Securitization, and Asset Sale Activities; and
- Adding new and revising existing reporting thresholds for certain data items on Schedule HC-P, HC-Q, and HC-S.

If approved by the Board, staff expects that these revised requirements would be effective for the June 30, 2018 reporting date, consistent with the timing of similar changes to the Call Reports.

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3 See 83 FR 2985 (January 22, 2018). This change and the following two FR Y-9SP changes were finalized in a previous proposal.
4 See 83 FR 18843 (April 30, 2018).
5 See 83 FR 15678 (April 11, 2018).

FR Y-11, FR 2314 and FR Y-7N

On May 1, 2018, the Federal Reserve requested comment on proposed revisions to the FR Y-11, FR 2314 and FR Y-7N [6] consistent with the changes to the Call Reports[7]. The comment period for the proposal ended July 2, 2018. These revised reporting requirements, will take effect June 30, 2018, subject to approval by the Board. The changes include:

- Adding a new data item to the balance sheet to separate and reclassify equity securities with readily determinable fair values from the "available for sale" category in accordance with Accounting Standards update (ASU) No. 2016-01, "Recognition and Measurement of Financial Assets and Financial Liabilities," and
- Adding new data items to the income statement to reflect the proper reporting of income associated with these 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, FR Y-7N, 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

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[6] 83 FR 19062 (May 1, 2018).
[7] 83 FR 939 (January 8, 2018).

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, FR Y-7N/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, FR Y-7N/S and FR Y-12 forms was published in the Federal Register.[8] 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

[8] 80 FR 52282 (August 28, 2015)

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**: Updates to the supplemental instructions are forthcoming due to the recently enacted legislation pertaining to the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA). Changes to data edits impacting the FR Y-9C and the FR Y-9SP reports for the June 30, 2018 report date are provided in a separate attachment. Changes to data edits impacting the FR Y-7N, 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.

Website

Report forms and instructions for the FR Y-9C, FR Y-9LP, FR Y-9SP, 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, August 9, 2018. Any **FR Y-9C** reports received after 5:00 p.m. on August 9, 2018 will be considered late. The submission deadline for **FR Y-9LP** and **FR Y-9SP** filers is Tuesday, August 14, 2018. Any **FR Y-9LP** or **FR Y-9SP** reports received after 5:00 p.m. on August 14, 2018 will be considered late. The submission deadline for **FR Y-11, FR 2314 and FR Y-7N** filers is Wednesday, August 29,

2018. Any **FR Y-11, FR 2314 or FR Y-7N** report received after 5:00 p.m. on August 29, 2018 will be considered late, unless postmarked by August 26, 2018 or sent by overnight service by August 28, 2018. The submission deadline for **FR Y-12** filers is Tuesday, August 14, 2018. Any **FR Y-12** reports received after 5:00 p.m. on August 14, 2018 will be considered late unless postmarked by August 11, 2018 or sent by overnight service by August 13, 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 Scott Smentek, Assistant Vice President, at (212) 720-8596.

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

Sincerely,

Scott Smentek
Assistant Vice President

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 website:
(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 website:
(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 website: (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 website: (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 website: (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 website: (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 website: (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 website: (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 website: (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 website: (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 website: (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 website: (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 website: (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 website:
(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 website:
(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 website:
(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 website:
(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 website:
(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 website:
(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 website:
(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 website:
(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 website:
(http://www.federalreserve.gov/reportforms/supplemental/SI.FRY9.200512.pdf).

ATTACHMENT 2

Revisions to the FR Y-9C for June 30, 2018

Approved Proposal:

Report Form and Instructions:

Delete data items:

(1) *Schedule HI, Memoranda data items 6(f) and 6(h): Delete these data items;*
(2) *Schedule HC-D, column B, for Domestic Offices; Delete column B;*
(3) *Schedule HC-D, data item 6(a), Column A, Delete this data item which will be reported in the appropriate sub-items on Schedule HC-D;*
(4) *Schedule HC-D, memoranda item 1(a), column A, delete this data item. This information will be reported in the appropriate sub-items on Schedule HC-D;*
(5) *Schedule HC-D, memoranda item 6, delete this data item.*

Delete and combine data items:

(6) *Schedule HC, data items 10(a) and 10(b), Delete these data items and include Goodwill as a separate item on Schedule M, Memorandum item 12(b);*
(7) *Schedule HC-B, data items 2(a) and 2(b), columns A through D, combine into new data item 2, U.S Government Agency Obligations;*
(8) *Schedule HC-B, data items 5(b)(1) through 5(b)(3), columns A through D, combine into new data item 5(b), Structured financial products;*
(9) *Schedule HC-D, data items 5(a)(1) through 5(a)(3), combine into new data item, 5(a), Structured financial products;*
(10) *Schedule HC-D, 6(a)(1), 6(a)(2), 6(a)(4) and 6(a)(5), Combine in new data item 6(a)2, All other loans secured by real estate;*
(11) *Schedule HC-D, data items 6(a)(3)(a) through 6(a)(3)(b)(ii), combine into new data item 6(a)(1), Loans secured by 1-4 family residential properties;*
(12) *Schedule HC-D, data items 6(c)(1) through 6(c)(4), combine into new data item 6(c), Loans to individuals for household, family, and other personal expenditures;*
(13) *Schedule HC-D, memoranda items 1(a)(1), 1(a)(2), 1(a)(4), and 1(a)(5),combine into new memo item 1(a)(2), All other loans secured by real estate;*
(14) *Schedule HC-D, memoranda items 1(a)(3)(a) through 1(a)(3)(b)(ii), on the unpaid principal balance of certain residential loans measured at fair value: Combine into new memo item, 1(a)(1), Loans secured by 1-4 family residential properties;*
(15) *Schedule HC-D, memoranda items 1(c)(1) through 1(c)4, on certain consumer loans: Combine into new memo item 1(c), Loans to individuals for household, family and other personal expenditures;*
(16) *Schedule HC-D Column B on Schedule HC-L, data items 15(a) through 15(b)(8), pertaining to Monoline Financial Guarantors: Consolidate this information into column*

E, Corporations and all other Counterparties;

(17) Schedule HC-M, data item 12(b), on purchased credit card relationships and nonmortgage servicing assets: Combine in HC-M, data item 12(c), All other identifiable intangible assets.

<u>Semi-annual Reporting:</u>

(18) Schedule HI, memoranda item 16, on Noncash income from negative amortization on closed-end loans;
(19) Schedule HC-B, memoranda item 3, on the amortized cost of held-to maturity securities sold or transferred to available-for-sale or trading securities;
(20) Schedule HC-C, memoranda items 5(a) and 5(b), on purchased credit impaired loans;
(21) Schedule HC-C, memoranda items 6(a), 6(b), and 6(c), on closed-end loans with negative amortization features;
(22) Schedule HC-C memoranda items 12(a), 12(b), 12(c) and 12(d), on loans and leases held for investment that acquired in a business combination;
(23) Schedule HC-L, data items 1(b)(1) and 1(b)(2), on certain unused credit lines;
(24) Schedule HC-N, memoranda items 7 and 8, pertaining to nonaccrual loans, and memoranda items 9(a) and 9(b), on purchased credit-impaired loans.

<u>Annual reporting:</u>

(25) Schedule HC-M, data items 7(a) and 7(b), on captive insurance and reinsurance.

<u>Threshold changes:</u>

(26) Schedule HI-line item 6(a) through 6(j) and 7(a) through 7(p), increase threshold from 3% to 7%;
(27) Schedule HI- Memo item 9(a) through 9(e), modified the reporting threshold to be completed by holding companies that reported total trading assets of $10 million;
(28) HC-B Memoranda items 5(a) through 5(f) and 6(a) through 6(g) columns A through D, added a $10 billion threshold;
(29) Schedule HC-D, changed the reporting threshold so that the Schedule would be applicable to HCs with total trading assets of $10 million or more in any of the four preceding calendar quarters from the current threshold of $2 million in average trading assets over this same period;
(30) Schedule HC-D Memorandum items 2(a) though 5(f) and 7(a) through 10, added a reporting threshold of $10 billion or more in total trading assets in any of the four preceding calendar quarters;
(31) Schedule HC-K, line item 4(a), added a reporting threshold of $10 million or more in total trading assets in any of the four preceding calendar quarters;
(32) Schedule HC-L, line item 8, added a $100 billion (or more) threshold.

Pending FR Y-9C Proposal: Report form and Instructional changes:

(1) Schedule HC-F, line items 3(a) and 3(b), combine these two items in new item 3;
(2) Schedule HC-N, Memoranda items 5(b)(1) and 5(b)(2), columns A through C, deleted these items;
(3) Schedule HC-N, line item 5(a), renumbered as line item;
(4) Schedule P, modified the reporting criteria;
(5) Schedule P, combined several items pertaining to 1-4 family residential mortgage banking activity detail:

- *Combine 1(a), 1(b), and 1(c)(1) into new data item 1;*
- *Combine 2(a), 2(b), and 2(c)(1) into new data item 2;*
- *Combine 3(a), 3(b), and 3(c)(1) into new data item 3;*
- *Combine 4(a), 4(b), and 4(c)(1) into new data item 4; and*
- *Combine 6(a), 6(b), and 6(c)(1) into new item 6.*

(6) Schedule P, Line items 5(a) and 5(b), combined these two items into new item 5;
(7) Schedule P, Line items, 1(c)(2), 2(c)(2), 3(c)(2), 4(c)(2), and 6(c)(2), removed these items;
(8) Schedule HC-Q, Modified reporting criteria by applying an activity threshold;
(9) Schedule HC-Q, Memorandum items 3 and 4, deleted column B (Domestic Offices) and combined certain line items into the consolidated line items;
(10) Schedule HC-Q, Memoranda items 3(a) and 4(a), column A, delete these items;
(11) Schedule HC-Q, Memorandum items 3(a)(3)(a), 3(a)(3)(b)(i), and 3(a)(3)(b)(ii), column B, combine into new Memorandum item 3(a)(1) for the fair value of consolidated loans secured by 1-4 family residential properties measured at fair value;
(12) Schedule HC-Q, Memorandum items 3(a)(1), 3(a)(2), 3(a)(4), and 3(a)(5), column B, combine into new Memorandum item 3(a)(2) for the fair value of all other loans secured by real estate measured at fair value;
(13) Schedule HC-Q, Memorandum items 3(c)(1) through 3(c)(4), combine into new Memorandum item 3(c) pertaining to the fair value of all consumer loans measured at fair value;
(14) Schedule HC-Q, Memorandum items 4(a)(3)(a), 4(a)(3)(b)(i), and 4(a)(3)(b)(ii), column B, combine into new Memorandum item 4(a)(1) pertaining to the unpaid principal balance of consolidated loans secured by 1-4 family residential properties that are measured at fair value;
(15) Schedule HC-Q, Memorandum items 4(a)(1), 4(a)(2), 4(a)(4), and 4(a)(5), column B, combine into new Memorandum item 4(a)(2) pertaining to the unpaid principal balance of all other loans secured by real estate measured at fair value for the consolidated HC;
(16) Schedule HC-Q, Memorandum items 4(c)(1) through 4(c)(4, combine into new Memorandum item 4(c) pertaining to the unpaid principal balance of all consumer loans measured at fair value;

(17) *Schedule HC-S line item 2(a), 2(b), and 2(c), combine into new item 2 columns A through G;*
(18) *Schedule HC-S line item 3, add $100 billion threshold.*
(19) *Schedule HC-S line item 6(a) and 6(b), add a reporting threshold of $10 billion;*
(20) *Schedule HC-S line item 7(a), 7(b), 8(a) and 8(b), deleted these data items;*
(21) *Schedule HC-S line item 9, columns B through C, consolidate into existing G;*
(22) *Schedule HC-S line item 10, add a $10 billion threshold;*
(23) *Schedule HC-S line item 10, columns B and C, combine into existing G;*
(24) *Schedule HC-S line item 11 columns B through F, combine into existing column G;*
(25) *Schedule HC-S line item 12 columns B through F, combine into existing column G;*
(26) *Schedule HC-S memorandum item 1(a) and 1(b), delete and combine into either items 1 or 2 (column F) or items 11 and 12 (column G), depending on whether the obligations were securitized or not securitized, respectively;*
(27) *Schedule HC-S Memorandum item 3(a)(1) and 3(b)(2) and 4, add a $10 billion threshold;*
(28) *Schedule HC-V, Columns B and C for all data items, combine into a single column B;*
(29) *Schedule HC-V, line items 5 and 6, add these new data item;*
(30) *Schedule HC-V, line item 1(b) and 1(c), combine into new single item 1(b);*
(31) *Schedule HC-V, line item 1(e) through 1(g), combine into single new item 1(c);*
(32) *Schedule HC-V, line item 2(c) and 2(d), combine into new item 2(a);*
(33) *Schedule HC-V, line items 1(d), 1(h), and 1(i), include data items in existing data item 1(k), other assets and renumber 1(d). Renumber existing item 1(j) and*
(34) *Schedule HC-V, line items 2(a) and 2(b), consolidate into existing item 2(e) and renumber to 2(b).*

Instructions Only

None

Revisions to the FR Y-9LP for June 30, 2018

Report Form and Instructions

None

Instructions only

None

<u>Revisions to the FR Y-9SP for June 30, 2018</u>

<u>Report Form and Instructions</u>

Schedule SI, line item 9(a), 9(b) and 9(c), incorporated new accounting change for equity securities (ASU 2016-01);

Schedule SI, line item 11, added discontinued operations;

Schedule SC-M line item, 7(c), added fair value of equity securities with readily determinable fair values (ASU 2016-01).

<u>Instructions only</u>

Schedule SC- revised instructions for the reporting of certain tax benefits.

<u>Pending Revisions to the FR Y-7N for June 30, 2018</u>

<u>Report Form and Instructions</u>

Schedule IS, line item 8(a), 8(b) and 8(c), incorporated new accounting change for equity securities (ASU 2016-01);

Schedule BS line item, 2(c), added fair value of equity securities with readily determinable fair values not held for trading (ASU 2016-01).

<u>Instructions only</u>

Added language to incorporate revisions pertaining to ASU 2016-01.

<u>Pending Revisions to the FR Y-11 for June 30, 2018</u>

<u>Report Form and Instructions</u>

Schedule IS, line item 8(a), 8(b) and 8(c), incorporated new accounting change for equity securities (ASU 2016-01);

Schedule BS line item, 2(c), added fair value of equity securities with readily determinable fair values not held for trading (ASU 2016-01).

Instructions only

Added language to incorporate revisions pertaining to ASU 2016-01.

Pending Revisions to the FR 2314 for June 30, 2018

Report Form and Instructions

Schedule IS, line item 8(a), 8(b) and 8(c), incorporated new accounting change for equity securities (ASU 2016-01);

Schedule BS line item, 2(c), added fair value of equity securities with readily determinable fair values not held for trading (ASU 2016-01).

Instructions only

Added language to incorporate revisions pertaining to ASU 2016-01.

Revisions to the FR Y-12 for June 30, 2018

Report Form and Instructions

None

Instructions only

None

ATTACHMENT 3

Summary of Edit Changes - FR Y-7N
Effective as of June 30, 2018

FR Y-7N
(most recent changes listed first by type of change, edit type, and edit number)

Data of Change	Type of Change	Affected Edit Information Type	Number	Target Item	MDRM	Comments
20180630	Added	Quality	9050	IS-8a	FNBKHT69	
20180630	Added	Quality	9050	IS-8c	FNBK4301	
20180630	Added	Quality	9100	BS-2c	FNBKJA22	
20180630	Added	Validity	0220	IS-8c	FNBK4301	
20180630	Revised	Validity	0200	IS-8a	FNBKHT69	
20180630	Revised	Validity	0210	IS-12	FNBK4340	
20180630	Revised	Validity	0300	BS-8	FNBKC377	

Summary of Edit Changes - FR Y-11
Effective as of June 30, 2018

FR Y-11
(most recent changes listed first by type of change, edit type, and edit number)

Data of Change	Type of Change	Affected Edit Information Type	Number	Target Item	MDRM	Comments
20180630	Added	Quality	9050	IS-8a	BHCSHT69	
20180630	Added	Quality	9100	BS-2c	BHCSJA22	
20180630	Added	Validity	0205	IS-8c	BHCS4301	
20180630	Revised	Validity	0200	IS-8a	BHCSHT69	
20180630	Revised	Validity	0210	IS-12	BHCS4340	
20180630	Revised	Validity	0300	BS-8	BHCSC377	

Summary of Edit Changes - FR 2314
Effective as of June 30, 2018

FR Y-11
(most recent changes listed first by type of change, edit type, and edit number)

Data of Change	Type of Change	Affected Edit Information Type	Number	Target Item	MDRM	Comments
20180630	Added	Quality	9050	IS-8a	SUBIHT69	
20180630	Added	Quality	9100	BS-2c	SUBCJA22	
20180630	Added	Validity	0205	IS-8c	SUBI4301	
20180630	Revised	Validity	0200	IS-8a	SUBIHT69	
20180630	Revised	Validity	0210	IS-12	SUBI4340	
20180630	Revised	Validity	0300	BS-8	SUBCC377	