FEDERAL RESERVE BANK of NEW YORK

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SCOTT SMENTEK ASSISTANT VICE PRESIDENT

December 22, 2015

To: The Authorized Officials of Holding Companies (HCs), Foreign Banking Organizations (FBOs), and Unaffiliated State Member Banks:

The Federal Reserve has integrated the use of the universal Legal Entity Identifier (LEI) into its organizational structure data collections to enable improved analysis, particularly during stressed market conditions. The LEI is a 20-digit, alpha-numeric code that connects to key reference information, thereby enabling clear and unique identification of companies participating in global financial markets.

Holding companies with an existing LEI were required to report it as part of the contact information provided on the cover page of the *Annual Report of Holding Companies* (FR Y-6) and the *Annual Report of Foreign Banking Organizations* (FRY-7) effective with fiscal year-ends beginning October 31, 2014, and on the *Report of Changes in Organizational Structure* (FR Y-10) effective October 31, 2014.

The Federal Reserve is expanding the collection of LEIs to include all banking and nonbanking legal entities reportable on the Banking, Nonbanking, Savings and Loan (SLHC), and 4(k) schedules (not the Branch schedules) of the FR Y-10, and on the Organization Chart provided as part of the FR Y-6 and FR Y-7 submissions, only if an LEI has already been issued for the reportable entity at the time of submission. In addition, there will be a one-time information collection to populate existing LEI data for all FR Y-10 reportable entities (excluding branches). As recently published in the *Federal Register*, the Federal Reserve delayed the implementation date for the expanded collection of LEIs, from June 30, 2015, to December 31, 2015, in response to comments it received during the public comment period that ended May 19, 2015. Collection of existing LEI information will follow the normal FR Y-6 and FR Y-7 submission deadlines (90 days and four months after a reporting entity's fiscal year-end, respectively). The one-time collection will be effective December 31, 2015, must be reported to the FR Y-10 schedules within 30 days of their issuance.

The FR Y-10 Online electronic submission tool and the FR Y-10 report form will be updated to include the LEI on the Banking, Nonbanking, Savings & Loan, and 4(k) schedules effective December 31, 2015. **To meet the requirements of the one-time collection, please respond to** <u>NY.BSD.Annual.Mailing@ny.frb.org</u> indicating whether your organization has existing LEI data to report. LEIs that have not been renewed (lapsed LEIs) should not be reported as part of the one-time collection. On or shortly after December 31, 2015, Reserve Banks will provide a spreadsheet populated with the legal name, RSSD, city, and state for each entity in the structure of those organizations that have confirmed the existence of an LEI. The spreadsheet will need to be updated with LEI information for the applicable entities and submitted to the Federal Reserve Bank of New York no later than January 30, 2016.

If you have any questions regarding the collection of LEIs, please contact Staff Directors: Kenneth Aberbach, at (212) 720-8234; Morgan Norful, at (212) 720-8055; or Laura Stash, at (212) 720-5581.

Sincerely,

Scott Smentek Assistant Vice President Data and Statistics Function

cc: Organizational Structure Contact at the HC, FBO, or Unaffiliated State Member Bank