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Purpose and General Instructions

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Agenda

- Purpose and General Instructions
- Annual FR 2900 Items
- Deposits vs. Borrowings
- Transaction Accounts
- Nontransaction Accounts and Vault Cash
- Schedules AA, BB and CC
- Other FR 2900 Reporting Issues
- ReserveCalc

What is the FR 2900?

- The FR 2900 is a weekly/quarterly report reflecting daily data (Tuesday through Monday) where Depository Institutions (DIs) report "sources of funds"
- Amounts reported on the FR 2900 include:
 - Deposits held by the DI
 - Other funds (borrowings obtained from non-exempt entities)

The Purpose of the FR 2900

• The FR 2900 has two primary purposes:

- a) The calculation of money stock
- b) The calculation of reserve requirements

- Money supply is the total amount of money in the economy
- Three basic measures of money



<u>M1 - \$1.3 trillion</u>

Narrowest and most liquid measure of money, comprised of:

- Currency
- Travelers checks
- Demand deposits
- Other transaction accounts (ATS, NOW accounts)

<u>M2 - \$6.5 trillion</u>

- A broader measure. Includes, in addition to M1:
 - Small denomination time deposits (less than \$100,000)
 - Savings deposits, including MMDAs and non-institutional money market mutual funds (MMMFs)

<u>M3 - \$9.6 trillion</u>

- The broadest of the three measures. Includes, in addition to M2:
 - Large time deposits (\$100,000 or more)
 - Institutional money market mutual funds (MMMFs)

<u>M3 - \$9.6 trillion</u>

- Overnight and term repurchase agreements, \$100,000 or more
- Overnight and term Eurodollars

- The FR 2900 is the primary source of this information, and is used to construct money stock weekly
- The aggregate data are released each Thursday afternoon to the public in the Board's H.6 release



What are Reserve Requirements?

- Reserve requirements are a percentage of a depository institution's (DI's) deposits (or fractional reserves) that must be held either as cash in the "vault" of the DI, on deposit at the Federal Reserve Bank, or at a correspondent bank.
- Reserve requirements are one of the tools used by the Federal Reserve as a means to conduct monetary policy.

What are Reserve Requirements?

- Reserves can be added to or removed from the banking system by changing the reserve ratio applied to reservable liabilities.
- Other Monetary Policy tools

 System Open Market Operations
 Discount Window Lending

 U. S. branches and agencies of foreign banks, and banking Edge and Agreement corporations, regardless of size, must report the FR 2900 weekly

 U. S. branches and agencies of a foreign bank located in the same state and within the same Federal Reserve District are required to submit a consolidated report of deposits to the Federal Reserve Bank in the District in which they operate (excluding any balances of the IBF)

Reporting of Edge and Agreement Corporations

- When preparing the FR 2900, deposits of offices of a banking Edge or Agreement corporation should not be aggregated with related U.S. branches and agencies of foreign banks or commercial banks
- Banking Edge and Agreement corporations are required to file separate FR 2900 reports, regardless of size

September 2005 Deposit Reporting Requirements

• Applies to all institutions <u>except for</u> U.S. branches and agencies of foreign banks and Edge or Agreement corporations

Exempt		Non-exempt	
Net transaction accounts \leq		Net transaction accounts >	
\$7.0 million		\$7.0 million, OR Total deposits \geq	
		\$1.131 billion reduced reporting	
		limit	
Non-reporters	Annual	Quarterly	Weekly
	Reporters	Reporters	Reporters
Total deposits \leq	Total deposits >	Total deposits <	Total deposits \geq
\$7.0 million	\$7.0 million	\$169.8 million	\$169.8 million

 The Federal Reserve will continue to screen institutions, and inform each institution eligible for reduced reporting

- FR 2900 weekly: commercial banks, savings banks, savings and loan associations and credit unions
 - Total deposits above the "nonexempt deposit cutoff" and "net transaction accounts" above the indexed level, or
 - Total deposits above the "reduced reporting limit", regardless of the level of "net transaction accounts"

- FR 2900 quarterly: commercial banks, savings banks, savings and loan associations and credit unions
 - Total deposits below the "nonexempt deposit cutoff", and "net transaction accounts" above the indexed level

- FR 2910a: commercial banks, savings banks, savings and loan associations and credit unions
 - Total deposits between the "exemption amount" and below the "reduced reporting limit", and "net transaction accounts" below the indexed level

FR 2900 vs. FFIEC 002 Definitional Differences

• Consolidation of branches and agencies of the same foreign (direct) parent bank

<u>FR 2900</u>

– U.S. branches and agencies in the same Federal Reserve District and state <u>must</u> submit a consolidated FR 2900 report

FR 2900 vs. FFIEC 002 Definitional Differences

- Consolidation of branches and agencies of the same foreign (direct) parent bank
 FFIEC 002
 - U.S. branches and agencies in the same Federal Reserve District and state are not required to consolidate, but may submit a consolidated FFIEC 002 provided:
 - The offices are located in the same city and, insured and uninsured branches are not combined

FR 2900 vs. FFIEC 031/041 Definitional Differences

 Consolidation of domestic branches and subsidiaries

<u>FR 2900</u>

Head office and all branches in the 50 states plus District of Columbia
Subsidiary depository institutions

FR 2900 vs. FFIEC 031/041 Definitional Differences

Consolidation of domestic branches and subsidiaries

FFIEC 031/041

- Head office and all branches in the 50 states plus
 District of Columbia
- Majority owned, significant subsidiaries, including domestic commercial banks, savings banks, savings and loan associations
- Branches on military facilities, wherever located

FR 2900 vs. FFIEC 002/031/041 Definitional Differences

• "U.S." FR 2900

– 50 states plus District of Columbia

FFIEC 002/031/041

- 50 states plus District of Columbia

– Puerto Rico and U.S. territories and possessions

- See glossary "Banks, U.S. and foreign"

Where and When to Submit?

- The reporting week is a seven day period that begins Tuesday and ends the following Monday.
- The reports are due to the Federal Reserve by the Wednesday following the Monday as-of date via electronic submission, or signed hard copy sent by messenger or fax. (Please do not submit the same report via more than one method).

Where and When to Submit?

 Electronic submissions of these reports is available via the Internet via the IESUB application



Close of Business

- The term "close of business" refers to the cut-off time for posting transactions to the General Ledger (G/L) for that day.
- The time should be reasonable and applied consistently.

Close of Business

- Selective posting is prohibited
 - A debit or credit cannot be made without the offsetting transaction being posted; and
 - All transactions occurring during the period of time the books are open must be posted

- The FR 2900 should reflect only the G/L balance as of the "close of business" each day
- Balances should be reflected on the FR 2900 based on:
 - When an institution has <u>received</u> or sent funds and
 - The institution has a liability to make payment to a customer/third party

 Balances should be reported as of "close of business", regardless of when the transaction <u>should</u> have occurred.



- An institution is allowed to back-value only in the case of a clerical bookkeeping error.
- The FR 2900 may be adjusted to more accurately reflect the transaction as it should have been recorded.

 For significant post-closing adjustments, DIs should review their reports to determine whether revisions are required for additional as-of dates.

Back-valuing vs. Misposting Examples

Question 1

On day 1, Bank R receives a \$10 million demand deposit for the credit of Corporation A. However, due to a misposting error, Corporation A was credited \$1 million. On day 2, the error was discovered.

How should this be reported ?

Back-valuing vs. Misposting Examples

Answer

When the error is discovered on day 2, Bank R should revise the \$1 million misposted on day 1 to reflect the \$10 million deposit from Corporation A received on day 1. Thus, \$10 million should be reported in Line A.1.c on both days.
Back-valuing vs. Misposting Examples

Question 2

On day 1, Bank R borrows \$5 million from Bank S. However, Bank S erroneously sends \$15 million.

How should these funds be reported ?

Back-valuing vs. Misposting Examples

Answer

On day 1, Bank R does not report the \$5 million borrowing it receives, on the FR 2900. The \$10 million Bank R receives in error should be reported in Line A.1.a as "Due to banks".

Back-valuing vs. Misposting Examples

Answer

Bank R should exclude the \$10 million sent in error from Line A.1.a when those funds are returned to Bank S.

Reporting of Deposits in Foreign Currencies

- Transactions denominated in non-U.S. currency must be valued in U.S. dollars each reporting week by using one of the following methods:
 - The exchange rate prevailing on the Tuesday that begins the 7-day reporting week; or
 - The exchange rate prevailing on each corresponding day of the reporting week

Reporting of Deposits in Foreign Currencies

 Once a DI selects a method it must use that method consistently over time for all Federal Reserve reports.

Reporting of Deposits in Foreign Currencies

- If the DI chooses to change its valuation method, the change must be applied to all Federal Reserve reports and used consistently thereafter
- The Federal Reserve Bank of New York should be notified of any such change

Quarterly Report of Foreign (Non-U.S.) Currency Deposits (FR 2915)

- In addition, FR 2900 respondents holding foreign currency denominated deposits must file the Report of Foreign (Non-U.S.) Currency Deposits (FR 2915)
- This report is filed quarterly, and it includes weekly averages for selected items from the FR 2900

Related Institutions

- For U.S. branches and agencies of foreign banks, related institutions are defined as
 - The foreign (direct) parent bank
 - Offices of the same foreign (direct) parent bank
- For all other institutions
 Foreign (non-U.S.) branches

Reporting of Related Institutions

- Deposits due to or due from U.S. branches and agencies of the same (direct) parent bank should be <u>excluded</u> from the FR 2900
- Deposits due to or due from non-U.S. branches and agencies of the same foreign (direct) parent bank should be reported in Schedule CC

Foreign Bank Organization Chart



Bank Holding Company Organization Chart



Affiliates and Subsidiaries

- Affiliates and subsidiaries of the same (direct) parent bank should be treated as <u>unrelated</u> for purposes of Regulation D
- Deposits from these entities should be classified on the FR 2900 according to the type of entity (e.g., banking or nonbanking) and maturity

FR 2900 vs. FFIEC 002 Definitional Difference

<u>FR 2900</u>

Deposits of U.S. and non-U.S. subsidiaries are included on the FR 2900 (according to entity and maturity)

FFIEC 002

Deposits of U.S. and non-U.S. banking subsidiaries are excluded from Schedule E and included on Schedule M

Non-banking (majority owned) subsidiaries are included in both Schedules E and M, Part III

Summary

- Purpose of the FR 2900
- FR 2900 Filing Requirements
 - Who must file?
 - Consolidation
- Reporting Issues
 - Back valuing vs. misposting
 - Foreign currency valuation
 - Related vs. non-related institutions
 - Reporting differences between the FR 2900 and Call Reports

Patricia Maone



Objectives

- Primary obligations reportable on the FR 2900
- Exempt and non-exempt entities
- Examples of primary obligations
- Cash equivalents
- Precious metals borrowings



- A deposit is defined by Regulation D as the unpaid balance of money or its equivalent received or held by a depository institution in the usual course of business.
- In economic terms, deposits and borrowings are similar. However, they are different transactions from a legal and regulatory perspective.

 If a transaction is called a deposit it must be treated as a deposit, regardless of the counterparty and the terms of the transaction.

- Whether a transaction is considered a borrowing depends on the terms of the transaction.
- If the document does not specifically refer to the transaction as a borrowing, it should be recorded as a deposit.

Primary Obligations

- Primary obligations are borrowings that should be reported as either:
 - Transaction accounts
 - Savings deposits
 - Time deposits



Primary Obligations

- There are two factors to consider when determining if a transaction or instrument is a "primary obligation".
 - The type of entity with which the transaction is entered into; and
 - The nature of the transaction or instrument

Primary Obligations Exempt and Non-Exempt Entities

- The concept of exempt and non-exempt entity applies only to primary obligations.
- A "deposit" is reservable regardless of the counterparty.

Include as Exempt Entities

- The following are exempt entities:
 - U.S. commercial banks and trust depository companies and their subsidiaries
 - A U.S. branches or agencies of a foreign bank organized under Foreign (non-U.S.) law
 - Banking Edge and Agreement corporations
 - Industrial banks
 - Savings and loan associations and credit unions

Include as Exempt Entities

- Exempt entities also include:
 - Federal Reserve Banks
 - U.S. Government and its agencies
 - U.S. Treasury



60

Include as Non-exempt Entities

- The following are non-exempt entities:
 - Individuals, partnerships, and corporations (wherever located)
 - Securities brokers and dealers, wherever located.
 (Except when the borrowing has a maturity of one day, is in immediately available funds, and is in connection with securities clearance)
 - State and local governments in the U.S. and their political subdivisions

Include as Non-exempt Entities

• The following are non-exempt entities:

- A bank's holding company
- A bank's non-bank subsidiaries
- International Institutions (IBRD, IMF, etc.)
- Non-U.S. banks (related or unrelated)

Examples of Primary Obligations

- The following are examples of primary obligations to be included on the FR 2900 if entered into with a *non-exempt entity*
 - Repurchase agreements collateralized with assets other than U.S. government or federal agency securities
 - Purchases of immediately available funds

Examples of Primary Obligations

- The following are examples of primary obligations reportable on the FR 2900 if entered into with a *non-exempt entity*:
 - Promissory notes
 - Commercial paper
 - Due bills

Repurchase Agreements

- A repurchase agreement is an arrangement involving the sale of a security or other asset under a prearranged agreement to buy back that asset at a fixed price
- If repurchase agreements with non-exempt entities are not collateralized by U.S. government or federal agency securities, they are to be reported on the FR 2900

FR 2900 vs. FFIEC 002/031/041 Definitional Differences

<u>FR 2900</u>

Repurchase agreements, collateralized with assets other than U.S. Government or Federal Agency securities, are reported as deposits on the FR 2900

FFIEC 002/031/041

Repurchase agreements, collateralized with assets other than securities and with a maturity greater than one business day, are reported as borrowings

Federal Funds Purchased

- Federal funds are unsecured borrowings of immediately available funds
- Immediately available funds can be used or disposed of on the same business day the funds become available
- Federal funds purchased from a non-exempt institutions are reportable on the FR 2900

Promissory Notes and Commercial Paper

- A promissory note is a negotiable instrument which is evidence of a liability of a depository institution for funds that have been received.
- If the promissory note is issued to a non-exempt entity it should be reported on the FR 2900

Promissory Notes and Commercial Paper

 Commercial paper is an unsecured promissory note and should be reported on the FR 2900.



Due Bills

- A due bill is an instrument evidencing the obligation of a seller to deliver securities at some future date.
- If the due bill is not collateralized within 3 business days, it becomes reservable on the fourth business day <u>regardless</u> of the purpose or counterparty.

Reporting of Primary Obligations

- Any primary obligation of the reporting institution due to a non-exempt entity must be reported unless <u>all of</u> <u>the following</u> conditions are met:
 - Is subordinated to the claims of the depositors
 - Has a weighted average maturity of five years or more
 - Is issued by a DI with the approval of, or under the rules and regulations of, its primary federal supervisor

Guidelines for Reporting Primary Obligations


Borrowing of "Cash Equivalents"

• For purpose of Regulation D the term deposit is defined as the unpaid balance of money or its "equivalent".

Borrowings of "Cash Equivalents"

- Borrowings of U.S. Government or Agency security from non-exempt entities are reservable, if <u>uncollateralized</u>
 - If securities borrowings are collateralized with cash, the transaction is treated as a resale agreement, not a deposit

Borrowings of "Cash Equivalents"

- Borrowings of precious metals or other equivalents of money are to be reported on the FR 2900 in the same manner as other currency (e.g., U.S. dollars)
 - These are reported based on the counterparty and maturity



Borrowings of "Cash Equivalents"

- For example, borrowings of gold are considered reservable liabilities.
 - These are reported on the FR 2900, depending on the lender and the maturity.



True or False True

Repurchase agreements with a non-exempt entity collateralized by U.S. Treasury securities are not reportable on the FR 2900.

True or False

True

Commercial paper issued by a DI is reportable on the FR 2900.

True or False False

Borrowing of gold bullion from a U.S. corporation would not be reported on the FR 2900.

Federal funds purchased from which of the following institutions are reported on the FR 2900?

- a) U.S. branch of a foreign bank
- b) Finance Corp.
- c) ABC Bank, N.A.
- d) World Bank

Summary

- Deposit is defined as unpaid balance of money or its equivalent...
- Primary obligations are reportable on the FR 2900
- Exempt vs. non-exempt entities
- Borrowings of precious metals are considered cash equivalents reportable on the FR 2900

Transaction Accounts

Marc Plotsker



Transaction Accounts

- In general, there are two types of transaction accounts:
 - Demand deposits
 - "Other" transaction accounts (ATS, NOW, telephone and pre-authorized transfer accounts)

• Demand deposits are defined as:

 Deposits payable immediately on demand, or issued with an original maturity of less than seven days

 In addition, under the requirements of Regulation Q, interest cannot be paid on demand deposits

➤ Section 217.3

> Section 217.2 (d)



- Demand deposits include:
 - Checking accounts
 - Outstanding certified, cashiers', tellers' and official checks and drafts
 - Outstanding travelers' checks and money orders (unremitted)
 - Suspense accounts

- Demand deposits include:
 - Funds received in connection with letters of credit sold to customers, including cash collateral accounts
 - Escrow accounts that meet the definition of a demand deposit
 - "Primary obligations" with original maturities of less than 7 days entered into with non-exempt entities

Demand Deposits Due to Depository Institutions (Line A.1.a)

- Include deposits in the form of demand deposits due to:
 - U.S. commercial banks
 - Non-U.S. depository institutions (including banking affiliates and subsidiaries)
 - U.S. branches and agencies of other foreign (non-U.S.) banks, including branches and agencies of foreign official banking institutions

Demand Deposits Due to Depository Institutions (Line A.1.a)

- Include deposits in the form of demand deposits due to:
 - U.S. and non-U.S. offices of other U.S. banks and Edge and agreement corporations
 - Mutual savings banks
 - Savings and loan associations
 - Credit unions



Demand Deposits Due to U.S. Government (Line A.1.b)

- Include in this item deposit accounts in the form of demand deposits that are designated as <u>federal</u> <u>public funds</u>, including U.S. Treasury Tax and Loan accounts
- Include only deposits held for the credit of the U.S. government

Demand Deposits Due to U.S. Government (Line A.1.b)

 Interest-bearing U.S. Treasury Tax and Loan Account Note Balances are exempt from reserve requirements and should <u>not</u> be reported as deposits.

TT&L

- TT&L depository institutions have two options:
 - Remittance option
 - Note option

TT&L

– Remittance option

» By the end of next business day, TT&L deposits must be remitted to the FRB

TT&L

- Note option
 - By the end of next business day, TT&L deposits must be converted to open-ended interest-bearing notes
 - These note balances are primary obligations to the U.S. Government but not reported on the FR 2900

Other Demand Deposits (Line A.1.c)

• Include in this item all other deposits in the form of demand deposits, including:

– Demand deposits held for:

- Individuals, partnerships, and corporations
- State and local governments and their subdivisions
- Foreign governments (including foreign official banking institutions) and international institutions
- U.S. government agencies

Cashiers' and Certified Checks

- Cashiers' checks are those checks drawn by the reporting institution on itself
- Certified checks are any business or personal checks stamped with the paying bank's certification that:
 - The customer's signature is genuine; and
 - There are sufficient funds in the account to cover the check.

Tellers' Checks

Tellers' checks are those checks drawn by the reporting institution on, or payable at or through, another depository institution, a Federal Reserve Bank, or a Federal Home Loan Bank.

Tellers' Checks

• Those checks drawn on, or payable at or through, another depository institution, on a zero-balance account or an account <u>not</u> routinely maintained with sufficient balances to cover checks or drafts drawn in the normal course of business should be reported in Line A.1.c.

Tellers' Checks

- However, those checks drawn on an account in which the reporting institution routinely maintains sufficient balances should be:
 - Excluded from Line A.1.c.
 - The amount of the check should be deducted from the balances reported in Line B.1.

Suspense Accounts

 Unidentified funds received and held in suspense are considered deposits and are to be reported on the FR 2900.

• These funds should be reported as "Other demand deposits" in Line A.1.c

FR 2900 vs. FFIEC 002/031/041 Definitional Differences

Suspense accounts

<u>FR 2900</u>

Items held in suspense are reported in other demand.

FFIEC 002/031/041

Entries to the G/L in the period subsequent to the close of business on the report date are reported as if they had been posted to the G/L at or before the cut-off time.

- Overdrafts in deposit (due to) accounts:
 - When a deposit account is overdrawn, the balance should be raised to zero and not included as an offset to other demand deposit accounts
 - Instead the overdrawn amount should be reported as a loan by the reporting institution and excluded from this report



• Overdrafts in deposit (due to) accounts:

 The amount of the overdraft should not be netted against positive balances in the depositors' other accounts unless a bona fide cash management function is served

- Overdrafts in an account maintained at another depository institution (due from):
 - When a due from account becomes overdrawn, the balance should also be raised to zero
 - If the account is routinely maintained with sufficient funds, the overdrawn amount is considered a borrowing and excluded from this report

- Overdrafts in an account maintained at another depository institution (due from):
 - If the due from account is <u>not</u> routinely maintained with sufficient funds (e.g., zero balance account) the overdrawn amount is considered a demand deposit and must be reported in other demand in Line A.1.a

Bank ABC maintains the following demand deposits.

DDA Account	<u>Amount</u>
Corp. A	\$10,000
Corp. B	\$15,000
Corp. C	(\$5,000)
Corp. D	\$20,000

What should be reported on line A.1.c? \$45,000

Guidelines for Bona Fide Cash Management Agreements

- A bona fide cash management agreement exists when a depository institution:
 - Allows a depositor to use the balance in one deposit account to offset overdrafts in another deposit account
 - Some genuine cash management purpose is served

Guidelines for Bona Fide Cash Management Agreements

- A written agreement does not have to be in place to be "bona fide"
- The cash management agreement must have some indication the institution intends to use two or more checking accounts to control receipts and disbursements
Guidelines for Bona Fide Cash Management Agreements

Example 1

Establishing one account for receipts and another for disbursements would be considered bona fide.

Example 2

Establishing one account for payroll and another account for receipts and disbursements would not be considered bona fide.

Guidelines for Bona Fide Cash Management Agreements

Positive balances in one type of deposit account cannot be used to offset balances in another type of deposit account.

Example 3

An overdraft in a demand deposit account cannot be covered by positive balances in an MMDA account.

Escrow Accounts

- An escrow agreement is a written agreement authorizing funds to be held by a third party.
- The funds are placed with the depository institution until the agreement has been met, at which time the escrow funds are sent to the proper party.
- Escrow accounts are reported on the FR 2900 according to the terms of the escrow agreement.

Escrow Accounts

 If the funds may be withdrawn on demand or are to be disbursed within 7 days, the escrow account is a transaction account.

112

"Other" Transaction Accounts



"Other" Transaction Accounts

- "Other" transaction accounts are:
 - Deposit accounts (other than savings) where the
 DI reserves the right to require 7 days written notice
 prior to withdrawal/transfer of funds in the account
 - Subject to unlimited withdrawal by check, draft, negotiable order of withdrawal, electronic transfer, or other similar items
 - <u>Provided</u> the depositor is eligible to hold a NOW account

Negotiable Order of Withdrawal (NOW) Accounts (Line A.2)

- NOW accounts are deposits:
 - Where the DI reserves the right to require 7 days written notice prior to withdrawal/transfer of any funds in the account
 - That can be withdrawn/transferred to third parties
 by a negotiable or transferable instrument (more than 6 times per month)

NOW Account Eligibility

- Eligibility limited to accounts where the entire beneficial interest is held by:
 - Individuals or sole proprietorships
 - U.S. governmental units, including the federal government and its agencies
 - Non-profit organizations, such as churches, professional, and trade associations

Difference Between Demand Deposits and Other Transaction Accounts

- Demand deposits differ from "other" transaction accounts in that:
 - The DI does not reserve the right to require 7 days written notice before an intended withdrawal
 - There are no eligibility restrictions on who can hold a demand deposit account
 - Interest may <u>not</u> be paid on a demand deposit account





One account with two legally separate sub-accounts:

- > Transaction sub-account
- Non-transaction sub-account
- Disclosure

Sweeps

- Mechanics
 - At the first of month or beginning of statement cycle, balances above threshold are swept to the non-transaction sub-account (e.g., from NOW to MMDA)
 - When funds are needed in the transaction sub-account, funds are transferred to restore the transaction sub-account to its threshold amount (e.g., from MMDA to NOW)
 - Sixth transfer from the non-transaction sub-account transfers all funds back to the transaction sub-account until beginning of next month or statement cycle (e.g., MMDA to NOW)

Sweeps

- Line Items Affected by Sweeps:
 - A1C: Other Demand
 - A2: ATS/NOW
 - C1: Total Savings

Deductions From Transaction Accounts



- Consists of all balances subject to immediate withdrawal due from U.S. offices of DIs
- For purposes of the FR 2900 reporting, <u>immediately available</u> funds are:
 - Funds that the reporting institution has full ownership of and can invest or dispose of on the same day the funds are received

 Balances to be reported should be the amount reflected on the reporting institution's books rather than the amount on the books of the other depository institution.



- However, the use of correspondent's books is permissible if:
 - The transaction occurred on the previous day and the balances on the books of correspondent are accurate
 - Both debit and credit accounting entries are reported

 The transaction is segregated from transactions occurring the following day

The reporting treatment is consistent for all regulatory reports

- Include balances due from:
 - U.S. offices of
 - Commercial banks
 - Banker's banks
 - Edge and agreement corporations
 - ► U.S. branches and agencies of foreign (non-U.S.) banks
- The reporting institution may report reciprocal demand balances with the above institutions on a net or gross-by-institution basis, whichever method is less burdensome

- Also include balances due from:
 - Savings banks
 - Cooperative banks
 - Credit unions
 - Savings and loan associations

However, demand balances with these institutions must be reported gross.

• Exclude balances due from:

- Federal Reserve Banks (FRB) including:
 - The reporting institution's reserve balances held directly with the FRB
 - The reporting institution's reserve balances passed through to the FRB by a correspondent (e.g., FHLB)

Exclude balances due from:
 Federal Reserve Banks (FRB) including

The reporting institution's clearing balance maintained at a FRB

- Also exclude:
 - Balances due from other U.S. branches and agencies of the same foreign parent bank
 - Any "clearing house" or "next day funds"
 - Balances due from any non-U.S. office of any U.S. depository institution or foreign (non-U.S.) bank

- Also exclude:
 - Balances due from FHLB
 - Demand deposit balances due from other
 DIs pledged by the reporting institution and are not immediately available for
 withdrawal
 - National Credit Union Administration Central Liquidity Facility

- Also exclude:
 - Cash items in the process of collection (CIPC)

<u>However</u>, CIPC for which the reporting institution's correspondent provides immediate credit should be reported in this item

Reciprocal Balances

Reciprocal balances arise when two banks maintain deposit accounts with each other (i.e., each bank has a "due to" and "due from" balance with the other bank).



Reciprocal Balances

	Gross Method	
	" <u>Due to" banks</u>	" <u>Due from" banks</u>
Bank A	\$3M	\$5M
Bank B	10M	2M
Bank C	<u>6M</u>	<u>9M</u>
Total	\$ <u>19M</u>	\$ <u>16M</u>

Reciprocal Balances



FR 2900 vs. FFIEC 002/031/041 Definitional Differences

Due from depository institutions (Line B.1)

• Overdrafts in due from accounts

<u>FR 2900</u>

Reported as demand deposits in other demand Line A.1.c, if not routine

FFIEC 002/031/041

Reported as borrowings regardless of whether routine or not routine

FR 2900 vs. FFIEC 002/031/041 Definitional Differences

Due from depository institutions (Line B.1)Pass through reserve balances

<u>FR 2900</u>

Excluded from the FR 2900 if passed through FRB by a correspondent

FFIEC 002/031/041

Included in Schedule A/RC-A even if passed through to FRB by a correspondent

Cash Items in the Process of Collection (Line B.2)

- A cash item is defined as any instrument for payment of money immediately on demand.
- Include as cash items:
 - Checks or drafts drawn on another DI, or drawn on the Treasury of the United States, that are in the process of collection with:
 - ► Other DIs
 - Federal Reserve Banks
 - Clearing houses

Cash Items in the Process of Collection (Line B.2)

- Include as cash items:
 - Other items that are customarily cleared or collected, such as:
 - Redeemed government bonds and coupons
 - Money orders and traveler's checks

Cash Items in the Process of Collection (Line B.2)

- Also include as cash items:
 - <u>Unposted debits</u>: Cash items on the reporting institution that have been "paid" or credited by the institution and that have not been charged against deposits as of the close of business

Cash Items in the Process of Collection (Line B.2)

- Exclude from cash items:
 - Checks or drafts drawn on foreign banks or foreign institutions
 - Funds not received as a result of failed transactions (e.g., funds, securities, and/or foreign currency fails)
 - Checks or drafts deposited with its correspondent for which the reporting institution is given immediate credit (reported in Line B.1)

FR 2900 vs. FFIEC 002/031/041 Definitional Differences

Cash Items in the Process of Collection (Line B.2)

<u>FR 2900</u>

Excludes checks drawn on a Federal Reserve Bank

Excludes checks drawn on a bank outside the U.S.

FFIEC 002/031/041

Includes checks drawn on a Federal Reserve Bank on Schedule A/RC-A, Item 1

Includes all checks drawn on DIs, regardless of their location

Summary

• Transactions Accounts:

- Demand deposits
- "Other" transaction accounts
- Deductions from Transaction Accounts:
 - Due from DIs
 - CIPC

Savings Deposits

Dean Cornier




Non-transaction Accounts

Objectives

- Total Savings Deposits
- Total Time Deposits
- Time Deposits \geq \$100 thousand
- Brokered Deposits
- Guaranteed CDs
- Nonpersonal time and savings deposits

Savings Deposits

- Savings Deposits
 - -No specified maturity
 - Reserve the right to require 7 days written notice for withdrawals
 - Six Transfer/Withdrawal Rule
 - -Sweep Activity

Include as Savings Deposits (Line C.1)

- The following should be <u>included</u> if they meet the definition of a savings deposit:
 - Interest and non-interest bearing savings deposits
 - Compensating balances or funds pledged as collateral for loans
 - Escrow deposits
 - IRAs, Keogh, Club Accounts

Exclude From Savings Deposits (Line C.1)

- The following should be <u>excluded</u> from savings deposits:
 - Transaction accounts
 - Interest accrued on savings deposits but not yet credited to the customer's account
 - Any account with a specified maturity date

148

Terms of a Savings Deposit (Line C.1)

 The depositor is authorized to make no more than a combination of six transfers and withdrawals per calendar month or statement cycle

Types of Third Party Transfers (Line C.1)

- Third party transfer is a movement of funds using third party payment instrument from a depositor's account:
 - To another account of the same depositor at the same institution or,
 - To a third party at the same depository institution or,
 - To a third party at another depository institution by:
 - Pre-authorized or automatic transfer
 - Telephonic transfer, check or draft

Types of Third Party Transfers (Line C.1)

- A <u>preauthorized transfer</u> is an arrangement by the DI to pay a third party upon written or oral instruction by the depositor. This includes orders received:
 - Through an automated clearing house (ACH) or
 - Any arrangement by the reporting institution to pay at a predetermined time or on a fixed schedule

Types of Third Party Transfers (Line C.1)

- In a <u>telephonic transfer</u> DI receives an agreement, order, or, instruction to transfer funds in the depositor's account either by:
 - Telephone
 - -Fax

Third Party Transfers (Line C.1)

- <u>Not</u> considered third party transfers:
 - Withdrawals for payment directly to the depositor when made by:
 - ≻ Mail
 - ► Messenger
 - ► ATM
 - ► In person

Savings Deposits

Limited transfers

- Drafts
- Checks
- Debit Cards
- Automatic transfers
- Telephone transfers
- Preauthorized transfers

Unlimited transfers

- ATM
- In person
- Postal service/Mail
- Messenger delivery

Procedures For Ensuring Permissible Number of Transfers (Line C.1)

- To ensure that the permitted number of transfers or withdrawals do not exceed the limits a DI must either:
 - Prevent withdrawals or transfers of funds in this account that are in excess of the limits established by savings deposits; or
 - Adopt procedures to monitor those transfers on an ex-post basis and contact customers who exceed the limits established on more than an occasional basis for the particular account

Procedures For Ensuring Permissible Number of Transfers (Line C.1)

- For customers who violate these limits after being contacted, the DI must:
 - Close the account and place the funds in another account that the depositor is eligible to maintain; or
 - Take away the account's transfer and draft capabilities

Procedures For Ensuring Permissible Number of Transfers (Line C.1)

 If a DI does not monitor third party transfers from a savings deposit, the institution may be required to reclassify the account to transaction accounts

Summary

- Savings Deposits do not have a specified date to maturity.
- DIs have the right to reserve 7 days written notice prior to an intended savings withdrawal.
- Compliance with the six transfer withdrawal rule and sweep regulations.



159

Include as Time Deposits (Line D.1)

- A DI should include as time deposits personal and non-personal accounts deposited in the following forms:
 - Time open accounts (maturity of 7 days or more)
 - Escrow accounts
 - Brokered deposits
 - IRA, Keogh Plans
 - Compensating balances for funds pledged as collateral for loans

Other Time Deposits

- The following items could also be considered time deposits:
 - Deposit notes
 - Bank notes
 - Medium-term notes
 - Primary obligations, such as commercial paper issued to non-exempt entities

Include as Time Deposits (Line D.1)

- Also include as time deposits:
 - Liabilities arising from primary obligations issued in original maturities of 7 days or more to non-exempt entities



Exclude from Time Deposits (Line D.1)

- A DI should exclude any deposit that does not meet the definition of a time deposit such as:
 - Matured time deposits even if interest is paid after maturity, unless the deposit provides for automatic renewal at maturity
 - Transaction accounts
 - Interest accrued on time deposits but not yet paid or credited to the customer's account

Total Time Deposits (Line D.1)

- The depositor does not have the right and is not permitted to make withdrawals on deposits that:
 - Have a specified maturity of at least 7 days from the date of deposit
 - Are payable after a specified period of at least 7 days after the date of deposit
 - Are payable at least 7 days after written notice of an intended withdrawal has been given

Total Time Deposits (Line D.1)

- If a withdrawal is made less than 7 days after a deposit, the depositor is:
 - Penalized at least 7 days simple interest on amounts withdrawn within the first 6 days after deposit
 - If early withdrawal penalties are not in place then the account could be reclassified as a transaction account

FR 2900 vs. FFIEC 002/031/041 Definitional Differences

Time Deposits (Line D.1)

Primary Obligations

<u>FR 2900</u>

Primary obligations with non-exempt entities and an original maturity of greater than 7 days are reported as time deposits.

FFIEC 002/031/041

Primary obligations are classified and reported as borrowings.

Summary of Line D.1

- Seven days or greater
- Penalties for early withdrawal
- Interest bearing or non-Interest bearing
- Interest accrued and credited
- Primary obligations issued to non-exempt entities

Large Time Deposits (Line F.1)

A DI should report in this item time deposits accounts with balances \geq \$100 thousand.



Include as Large Time Deposits (Line F.1)

- A DI should include in large time any deposit already reported as total time with balances of \$100 thousand or more and:
 - Negotiable and nonnegotiable, certificates of deposits issued in denominations of \$100 thousand or more; and
 - Time deposits originally issued in denominations of less than \$100 thousand but because of interest credited or paid, or additional deposits, have balances of \$100 thousand or more

Criteria For Determining Large Time Deposits (Line F.1)

 Time deposits issued on a discount basis should be reported initially on the amount of funds received by the reporting institution.

Criteria for Large Time Deposits (Line F.1)

 If the value of foreign currency denominated deposits falls below \$100 thousand (because of a change in exchange rates) the deposit must still be reported as a large time deposit based on the original value.

Exclude from Large Time Deposits (Line F.1)

- Time deposits that do <u>not</u> meet the definition of a large time should be excluded such as:
 - Time deposits less than \$100 thousand
 - Combined deposits totaling \$100 thousand that are represented by separate certificates or accounts, even if held by the same customer

• True or False **True**

DI receives \$96 thousand in exchange for a CD issued at face value of \$100 thousand. This CD should be regarded as having a denomination < \$100 thousand and excluded from Line F.1.

- XYZ Bank received a security deposit payable at the expiration of a specified time not less than 7 days after the date of deposit.
- Should this type of deposit be reported in Time Deposits?

- Security deposits with a maturity greater than or equal to 7 days meet the definition of time deposits and should be reported in line D.1
- If the security deposit is ≥ \$100 thousand, it should also be reported in line F.1

• True or False

A depositor has several time deposits issued in denominations of \$30 thousand; \$50 thousand; and \$20 thousand. Since the total equals \$100 thousand, this activity should be reported in lines D.1 and F.1

True or False
False

This activity should only be reported in Total time, Line D.1. Line F.1 should not reflect this activity since these <u>individual</u> deposits are not equal to or greater than \$100 thousand.

• True or False **True**

Commercial paper issued by XYZ Bank Head Office, or if issued by a U.S. branch or agency, deposited for a period greater than 7 days is reportable as a time deposit.

Summary of Line F.1

- Must be greater than or equal to \$100 thousand
- Must be held for a minimum of 7 days
- May be issued to personal and non-personal counter-parties
- Interest accrued and <u>credited</u> to the customer's account.

Treatment of Brokered Deposits

• What is a brokered deposit?

Funds in the form of a deposit that a DI receives from brokers or dealers on behalf of individual depositors.

180
Treatment of Brokered Deposits

- For purposes of the FR 2900, in addition to line D.1, brokered deposits are usually reported as:
 - Large time deposits with balances \geq \$100 thousand (Line F.1)
 - Total non-personal savings and time deposits (Line BB.1) unless any of the following are true:

Treatment of Brokered Deposits

- The deposit and beneficial interest is held by a natural person; or
- The DI has the following agreement with the deposit broker:
 - The broker maintains records of the owners of all brokered deposits, and these records are available to the DI;

Treatment of Brokered Deposits

- These records will provide the DI with the amounts of the deposits owned by natural and non-natural persons
- A breakout of large time deposits
- The DI must have access to these records
- The broker must commit to provide any other data needed by federal or state regulators

Guaranteed CDs

Guaranteed CDs are CDs issued by Non-U.S. offices of a foreign bank, and **guaranteed payable** in the U.S. by a DI.



Guaranteed CDs

- Payment of a deposit in a Non-U.S. branch of a DI guaranteed by a promise of payment at an office in the U.S. is subject to Regulation D and therefore is included on the FR 2900
- Since the payment is guaranteed at an office in the U.S., the customer no longer assumes country risk but enjoys the same rights as if the deposit had been made in the U.S.

Nonpersonal Savings and Time Deposits (Line BB.1)

- Reduced reporting frequency of nonpersonal time deposits
- Item BB.1 will be reported only one day each year
 - For weekly reporters: June 30
 - For quarterly reporters: as-of the Monday in the quarterly reporting week in June

Nonpersonal Savings and Time Deposits (Line BB.1)

 Non-personal savings and time deposits represent funds in which the beneficial interest is <u>not</u> held by a natural person. (A natural person is defined as an individual or a sole proprietorship.)

Include as Nonpersonal Savings and Time Deposits (Line BB.1)

- Include as non-personal savings and time deposits:
 - Funds deposited to the credit of or in which the beneficial interest is held by a depositor that is not a natural person
 - Brokered deposits if the beneficial interest is held by a non-natural person
 - Funds that are transferable whether or not the entire beneficial interest is held by a natural person

Exclude from Nonpersonal Savings and Time Deposits (Line BB.1)

Funds which are not transferable and that the entire beneficial interest is held by a depositor who is a natural person

Vault Cash

Juan Batista



 Vault cash is U.S. currency and coin owned and held by the reporting institution that may be used at any time to satisfy depositors' claims.

- Vault cash includes:
 - U.S. currency and coin in transit to a Federal Reserve Bank or correspondent bank for which the reporting institution has not yet received credit
 - U.S. currency and coin in transit from a Federal Reserve Bank or correspondent bank for which the reporting institution has already been charged

- Also included, is vault cash placed on the premises of another institution provided:
 - The reporting institutions has full rights of ownership to obtain the currency and coin immediately in order to satisfy customer demands
 - The institution from which the vault is rented does not include currency and coin as its own vault cash

- Exclude the following items from vault cash:
 - Foreign currency and coin
 - Silver or gold coin (bullion) and other currency where its nominal value exceeds its face value
 - Coins and collections held in safekeeping for customers
 - Any currency and coin the reporting institution does not have the full and unrestricted right to use to satisfy depositor's claims

FR 2900 vs. FFIEC 002/031/041 Definitional Differences

Vault Cash

<u>FR 2900</u>

Vault cash includes only U.S. currency and coin

FFIEC 002/031/041

Vault cash includes both U.S. and Non-U.S. currency (converted to U.S. dollars)



196



- A banker's acceptance (BA) is a draft or a bill of exchange for which the reporting institution assumes an obligation to make a payment at maturity, as specified in the acceptance.
- The acceptance represents an unconditional promise to pay the amount of the acceptance at maturity, substituting the bank's own credit on behalf of its customer.

 Report in Schedules AA and BB only BAs that are ineligible for discount by the Federal Reserve.



- A BA is <u>not eligible</u> to be discounted at a Federal Reserve Bank if:
 - It is <u>not</u> secured at the time of acceptance by a warehouse receipt or other such document conveying or securing title covering (collateralized) readily marketable goods, or
 - It has an original maturity of greater than 180 days
 - <u>Note</u>: An acceptance <u>not</u> eligible for discount at the Federal Reserve Bank is an ineligible acceptance.

- <u>Issuing</u> Once issued, the acceptance becomes an obligation of the reporting institution. Therefore, it should be <u>included</u> on Schedules AA or BB if ineligible.
 - Report the dollar amount of funds received (for those outstanding ineligible acceptances that resulted in funds being obtained).

- <u>Discounting</u> Ineligible acceptances are not reservable if the issuing bank later holds them in its own portfolio.
- <u>Rediscounting</u> An ineligible acceptance is only reservable (outstanding) when sold to a non-exempt entity.

 <u>Maturing</u> - When a bankers acceptance matures, the holder (bearer) of the BA is paid the face value by the issuing bank and therefore, is excluded from Schedules AA and BB.

• Report in Line AA.1 ineligible acceptances with original maturities of **less than** 7 days

 Report in Line BB.2 ineligible acceptances with original maturities of seven days or more that are nonpersonal



204



Schedule AA

- This schedule includes a breakdown, by maturity, of amounts outstanding of:
 - Ineligible banker's acceptances
 - Funds received through the issuance of obligations by nondepository affiliates



• Report the amount of funds obtained by the reporting institution when its nondepository affiliates use the proceeds of the obligations that they issue to supply funds to the reporting institution.



 Such obligations may be in the form of promissory notes (including commercial paper), acknowledgments of advance, or due bills



 Such obligations should be reported only to the extent that they would have constituted deposits had they been issued by the reporting institution



Question 1

 Nondepository affiliate issues an unsecured due bill to Co. A for \$10 million with a maturity of three months. An affiliate funds Bank A, NY \$10 million by purchasing a \$10 million loan. The loan has a maturity of two months.

How should Bank A, NY reported the \$10 million on the FR 2900?



How should Bank A, NY report the \$10 million?

210



<u>Answer 1</u>: Bank A, NY would report \$10 million in Schedule BB.2 on the FR 2900 (when applicable). 211

Question 2

Nondepository affiliate issues a \$20 million commercial paper (CP) to Co. A with a maturity of six months. Bank A, NY is funded the \$20 million by issuing a \$20 million CD to its affiliate. CD has a maturity of one year.

How should this transaction be reported on the FR 2900?



How should Bank A, NY report \$20 million?



<u>Answer 2</u>: Bank A, NY would report \$20 million as a six month nonpersonal CD in Lines D.1, F.1, and BB.1 (when applicable). 214

Schedules AA and BB

- Report in Schedules AA and BB:
 - Ineligible banker's acceptances
 - Funds received through the issuance of obligations by affiliates
- Obligations with maturities of less than 7 days in Line 1, Schedule AA.
- Obligations with maturities equal to or greater than • 7 days and if the counter party is nonpersonal, in Line 2, Schedule BB.

Net Eurocurrency Liabilities

- Schedule CC is reported one day each year:
 - For weekly reporters: June 30
 - For quarterly reporters: as-of the Monday in the quarterly reporting week in June
- Guidance for completing Schedule CC can be found in the FR 2900 instructions
- Additional information is included in the handout materials

 Schedule CC requires that a single number be reported, representing the net Eurocurrency liabilities for your institution as of the report date

 As outlined in the FR 2900 instructions, "Worksheet Items" correspond to the former FR 2950 and FR 2951 line items

- For commercial banks, Edge and Agreement Corporations, savings banks, savings and loan associations, and credit unions:
 - » Gross Liabilities to Own Non-U.S. Branches plus Net Liabilities to Own IBF (Worksheet Item 2)
 - Minus Gross Claims to Own Non-U.S. Branches plus Net Claims on Own IBF (Worksheet Item 3)
 - » Plus Assets Held by Own IBF and Own Non-U.S. Branches Acquired from U.S. Offices (Worksheet Item 4)
 - » Plus Credit Extended by Own Non-U.S. Branches to U.S. Residents (Worksheet Item 5)
- If this amount is negative, set to zero and include:
 - Series Borrowings From Non-U.S. Offices of Other Depository Institutions and from Certain Designated Non-U.S. Entities (Worksheet Item 1)
 220

 For commercial banks, Edge and Agreement Corporations, savings banks, savings and loan associations, credit unions:

 $((\text{Item 2 - Item 3}) + \text{Item 4} + \text{Item 5})^* + \text{Item 1})$

* If negative, enter 0

- For U.S. Branches and Agencies of Foreign Banks:
 - Scross Liabilities to Own Non-U.S. Branches plus Net Liabilities to Own IBF (Worksheet Item 2)
 - Minus Gross Claims to Own Non-U.S. Branches plus Net Claims on Own IBF (Worksheet Item 3)
 - Plus Assets Held by Own IBF and Own Non-U.S. Branches Acquired from U.S.
 Offices (Worksheet Item 5)
 - Minus 8% of Total Assets Minus Certain Assets and Positive Net Balances Due From Own IBF and the Parent Bank's U.S. and Non-U.S. Offices (Worksheet Item 4)
- If this amount is negative, set to zero and include:
 - Source Section Sect

• For U.S. branches and agencies of foreign banks:

((Item 2 - Item 3) + Item 5) - 0.08x(Item 4))* + Item 1

* If negative, enter 0

Other FR 2900 Reporting Issues

Brian Osterhus





Guidelines for Reporting Payment Errors on the FR 2900 Report

- Regardless of which party is responsible for the payment error, the holder of the funds incurs a reservable liability that should be reflected on the FR 2900
- This treatment ensures reserve requirements and money stock on an aggregate level are unaffected by payment errors

Guidelines for Reporting Payment Errors on the FR 2900 Report

• This treatment is applied regardless of the application of as-of adjustments or the payment of compensation from the other depository institution



Four types of payment errors:

- 1. Duplicate payment
- Occurs when the sending institution transfers funds more than once
- The receiving institution reports these funds as a demand deposit until the duplicate payment is returned
- The sending institution should not report the duplicate payment either as a due from bank or a CIPC

2. Misdirected payment

- Occurs when the sending institution transfers funds to the wrong bank
- The receiving institution reports these funds as a demand deposit until the funds are returned
- The sending institution should not report these funds either as a due from bank or a CIPC
- The institution that did not receive the expected funds does not report these funds as a due from or CIPC 228

3. Failed payment

- Occurs when an institution fails to make payment requested by a customer because of system problems, clerical errors, or other problems
- The institution that retained the funds must report them as a demand deposit until the funds are disbursed
- The institution that did not receive the expected funds does not report these funds either as a due from bank or a CIPC

4. Improper payment

- Occurs when a third party payment is made through Fedwire usually between the hours of 6:00 PM and 6:30 PM (known as the settlement period) when only "settlement transfers" are allowed
- The receiving bank reports these funds as a demand deposit
- The sending bank does not report these funds either as a due from bank or a CIPC

As-of Adjustments for Payment Errors

- As-of adjustments will not be issued for payments between two DIs
- As-of adjustments associated with errors may be issued **ONLY** if associated with improper transfers

Question 1

- Bank R is expecting a \$10 million funds transfer from Bank S.
- Bank S wires the \$10 million to Bank R at 12:00 PM. At 12:30 PM Bank S wires another \$10 million without realizing that the 12:00 PM transfer was sent.

How should each institution report this transaction?

Answer

- Bank R reports the \$10 million received in error in addition to the \$10 million it received as a demand deposit in Line A.1.c
- Bank S does not report the \$10 million sent in error as either a due from Bank R (Line B.1) or a CIPC (Line B.2)

Question 2

 Bank S was requested to make a payment of \$20 million to Bank R. Before the transfer is executed, Bank S experiences a power failure and the funds could not be transferred until the next day. (On day 2 the funds were transferred to Bank R).

How should each institution report this transaction?

Answer

- Bank S reports the \$20 million as a demand deposit on Line A.1.c
- Bank R does not report these funds as either a due from Bank S (Line B.1) or a CIPC (Line B.2)

Question 3

• Bank S transfers \$15 million on behalf of a corporate customer to Bank R at 6:15 PM.

How should each institution report this transaction?

Answer

- Bank R reports the \$15 million as a demand deposit in Line A.1.c
- Bank S does not report these funds as either a due from Bank R (Line B.1) or as a CIPC (Line B.2)

Question 4

• Bank S is instructed to send a \$50 million funds transfer to Bank R. However, due to an error the funds were accidentally sent to Bank A.

How should each institution report this transaction?

Answer

- Bank A reports the \$50 million as a demand deposit in Line A.1.c
- Neither Bank S nor Bank R should report these funds as a due from bank (Line B.1) or as a CIPC (Line B.2)

Deposits from U.S. Residents Payable at an Office Located Outside the U.S.

Regulation D defines "United States resident" as:

- Any individual residing in the U.S. (at the time of the deposit)
- Any corporation, partnership, association or other entity organized in the U.S. (domestic corporation)
- Any branch or office located in the U.S. of any entity not organized in the U.S.

Deposits from U.S. Residents Payable at an Office Located Outside the U.S.

- Regulation D **exempts** from reserve requirements "any deposit payable solely at an office located outside the U.S."
- "Any deposit payable only outside the U.S." means:
 - The depositor is entitled, under the agreement with the institution, to demand payment <u>only outside the</u> <u>U.S</u>., and
 - If the depositor is a U.S. resident, the deposit must be in a denomination of <u>\$100 thousand or more</u> 241

Regulation D does not exempt any deposit of a U.S. resident in denominations of less than \$100 thousand, payable at an office outside the U.S.

• Therefore, these deposits must be reported on the FR 2900 if your institution:

 Solicits these deposits from U.S. residents and the ultimate liability of these deposits is with the parent or any other office of the parent located outside of the U.S.

Question 1

Bank A, NY branch receives \$80 thousand from ABC Co. In the U.S. Bank A. NY branch transfers the \$80 thousand to Bank A, Tokyo branch for the credit of ABC Corp.

How should this transaction be reported?

<u>Answer</u>: The transaction should be reported as a deposit on the FR 2900.

Question 2

Bank A, NY branch solicits \$120 thousand from ABC Co. in the U.S. Bank A, NY branch transfers the \$120 thousand to Bank A, Tokyo branch for the credit of ABC Corp.

How should this transaction be reported?

Answer: The transaction is **not** reported on the FR 2900.

Summary

- Payment System Problems
 - Duplicate
 - Misdirected
 - Failed
 - Improper
 - Deposits from U.S. residents < \$100 thousand payable outside the U.S.

ReserveCalc

Claudette Knight



ReserveCalc Features

Reserve Maintenance Information

- Balance Calculator
- Position
- Account Balances
- As-of Adjustments
- Requirement
- Reservable Liabilities
- Position History

Print Report Useful links

ReserveCalc



Account Mgmt. Info.

We'll start out with the Balance Calculator. For most users, this is the first report that you'll see.

Balance Calculator

The Balance Calculator provides a summary of the current maintenance period including Total Balance Requirement, Carry-Over from the Prior Period, Account Balances to date and As-of Adjustments.

BALANCE CALCULATOR	MAI	MAINTENANCE PERIOD 05/26/2004 Correspondent: No			
Maintenance Period Status: Prelimin	ary				
	Aggregate	÷Days	Average		
Total Balance Requirement	<u>2,450</u>	(÷ 7)	350		
Carry-Over from Prior Period	0	(÷ 7)	0		
Total Balances to be Held	2,450				
FRB Actual Balances (4 Days)	<u>1,467</u>	(÷4)	367		
User Estimated Balances (0 Days)	0				
FRB Actual As-of Adjustments	<u>0</u>	(÷ 7)	0		
User Estimated As-of Adjustments	0				
Total Balances Held (includes Estimates)	1,467				
Additional amount to be held					
for remaining 3 days	983	(÷3)	328		

Balance Calculator

Second developments
The Balance
Calculator helps you
calculate the balance
you need to hold to
achieve a zero net
position.

It updates automatically each day and provides the Target Balance to be held for the remaining days in the maintenance period.

MAI	MAINTENANCE PERIOD 05/26/2004			
	Correspondent: No			
ary	Merger Survivor: No			
Aggregate	÷Days	Average		
<u>2,450</u>	(÷ 7)	350		
0	(÷ 7)	C		
2,450				
<u>1,467</u>	(÷4)	367		
0				
<u>0</u>	(÷ 7)	0		
0				
1,467				
1,467	(+3)	32		
	ary Aggregate 2,450 0 2,450 1,467 0 0 0	05, Correspondent Aggregate ÷ Days 2,450 (÷7) 0 (÷7) 2,450 1,467 (÷4) 0 0 (÷7) 0 1,467		

Balance Calculator

It also indicates the range of average daily balances that can produce a zero position.

BALANCE CALCULATOR		MAINTENANCE PERIOD 05/26/2004			
<u>Additional amount to be held</u> for remaining 3 days	Aggi	regate	÷Days	Average	
		983	(÷3)	328	
A Zero Position Can Be Achieved Anywhere Between:					
Lowest Balance					
(Average Carry-Over to next period	l = 0)	808	(÷ 3)	269	
Highest Useful Balance					
(Average Carry-Over to next period	(0 = b	1,158	(÷3)	386	
The Balance Calculator is interactive as well. It allows you to estimate future balances or as-of adjustments, and then recalculate the Target Balance.

Click the Balance Calculator button to estimate your account balances.

BALANCE CALCULATOR	MAINTENANCE PERIOD 05/26/2004			
Ag	gregate	÷ Days	Average	
Additional amount to be held for remaining 3 days	983	(÷3)	328	
A Zero Position Can Be Achieved Anywhere Between:				
Lowest Balance				
(Average Carry-Over to next period = 0)	808	(÷ 3)	269	
Highest Useful Balance				
(Average Carry-Over to next period = 0)	1,158	(÷3)	386	
Balance Calc	ulator	e.		

Tips

- Enter estimated balances and estimated as-of adjustments in dollars and cents.
- For holidays, estimated balances entered by the user, should be identical to the balance for the previous day.
- ReserveCalc automatically uses Friday's estimated balance for the following Saturday and Sunday.

BALANCE CALCULATOR -

DETAIL

Let's assume you want to know what your Target Balance should be for the remaining days in the maintenance period, if you close with \$250,000.00 in your account on Monday night.

Enter your estimated balance, then click the Calculate button.

Enter vour Ac	count Balance es	timates (in dollars)
Thursday	05/20/2004	398,876.30
Friday	05/21/2004	356,197.36
Saturday	05/22/2004	356,197.36
Sunday	05/23/2004	356,197.36
Monday	05/24/2004	250000.00
Tuesday	05/25/2004	
Wednesday	05/26/2004	

Current FRB As-of Adjustments (in thousands): Enter your aggregate As-of Adjustment estimate (in dollars)...

MAINTENANCE PERIOD 05/26/2004

Calculate

0

	BALANCE CALCULATOR - YOUR ESTIMATES	PE	RIOD 05,	26/2004
		Aggregate	÷ Days	Average
The estimated	Total Balance Requirement	2,450	(÷7)	350
balance is now included in the	Carry-Over from Prior Period	0	(÷7)	0
	Total Balances to be Held	2,450		
calculation, and a new Target	FRB Actual Balances (4 Days)	1,467	(÷ 4)	367
Balance and	User Estimated Balances (1 Days)	250		
Range are	FRB Actual As-of Adjustments	0	(÷7)	0
provided for the	User Estimated As-of Adjustments	0		
remaining 2 days of the maintenance period.	Total Balances Held (includes Estimates)	1,717		
	Additional amount to be held for remaining 2 days	733	(÷2)	367
	A Zero Position Can Be Achieved Anywhere Between:	•		
	Lowest Balance			-
	(Average Carry-Over to next period = 0)	558	(÷ 2)	279
	Highest Useful Balance			
	(Average Carry-Over to next period = 0)	908	(÷2)	454

256



Next, let's view the Preliminary Position report for this maintenance period by clicking the Position link.

POSITION - PRELIMINARY DIRECT

This is the Preliminary Position Report. It shows your position for the current and prior two maintenance periods.

POSITION - PRELIMINART DIRECT			06/02/2004
	<u>Point in Ti</u>	me: Now	<
Maintenance Period End Dates	06/02/2004	05/26/2004	05/19/2004
Reserve Requirement	<u>237</u>	<u>237</u>	237
Clearing Balance Requirement	350	350	350
Total Requirement	587	587	587
Usable Vault Cash	237	237	237
Account Balances	818	443	378
As-of Adjustments	<u>0</u>	<u>0</u>	<u>0</u>
Total Maintained	1,055	680	615
Gross Position	468	93	28
Carry-Over from Prior Period	0	0	0
Clearing Balance Allowance	25	25	25
Subtotal	443	68	3
Allowable Carry-Over to Next Period	0	0	0
Carry-Over Offset in Next Period	0	0	0
Net Position	443	68	3

MAINTENANCE PERIOD

New Feature:	POSITION - PRELIMINARY DIRECT			NCE PERIOD 16/02/2004
		Point in Time:	Now	<
The default "Point In Time"	Maintenance Period End Dates	06/02/2004 05	Vow 05/28/2004 End	l of Day
for Position reports is	Reserve Requirement	<u>237</u>	237	237
"Now," showing	Clearing Balance Requirement	350	350	350
you the most	Total Requirement	587	587	587
up-to-date	Usable Vault Cash	237	237	237
information	Account Balances	818	443	378
available. To	As-of Adjustments	<u>0</u>	<u>0</u>	<u>0</u>
view a report	Total Maintained	1,055	680	615
generated at a	Gross Position	468	93	28
point in time in the past, select a date from the pulldown menu.	Carry-Over from Prior Period	0	0	0
	Clearing Balance Allowance	25	25	25
	Subtotal	443	68	3
	Allowable Carry-Over to Next Period	0	0	0
	Carry-Over Offset in Next Period	0	0	0
	Net Position	443	68	3

\square	POSITION - PRELIMINARY DIRECT		MAINTE	NANCE PERIOD 06/02/2004
New Feature:		Point in Tir	me: 05/28/2004	End of Day 🔽
This is the	Maintenance Period End Dates	06/02/2004	05/26/2004	05/19/2004
Point In Time				
Position report	Reserve Requirement	237	237	237
selected. Net	Clearing Balance Requirement	350	350	350
position is	Total Requirement	587	587	587
based on	Usable Vault Cash	237	237	237
account	Account Balances	900	443	378
balances and	As-of Adjustments	0	0	0
as-of	Total Maintained	1,137	680	615
adjustments,	Gross Position	550	93	28
at the end of	Carry-Over from Prior Period	0	0	0
the day on 05/28/2004.	Clearing Balance Allowance	25	25	25
	Subtotal	525	68	3
	Allowable Carry-Over to Next Period	0	0	0
	Carry-Over Offset in Next Period	0	0	0
\square	Net Position	525	68	3

\frown	POSITION - PRELIMINARY DIRECT MAINTENANCE PERI 06/02/20			ANCE PERIOD 06/02/2004
To see detail on	Maintenance Period End Dates	06/02/2004	05/26/2004	05/19/2004
your daily account	Reserve Requirement	<u>237</u>	<u>237</u>	<u>237</u>
balances, click on	Clearing Balance Requirement	350	350	350
Account	Total Requirement	587	587	587
Balances in the	Usable Vault Cash	237	237	237
menu selection	Account Balances	900	443	428
items, or on the	As-of Adjustments	<u> </u>	<u>0</u>	<u>0</u>
dollar amount in	Total Maintained 🥣 🤘	1,137	680	665
the report.	Gross Position	550	93	78
10012 - California - Barrisolarity	Carry-Over from Prior Period	0	0	0
	Clearing Balance Allowance	25	25	25
	Subtotal	525	68	53
	Allowable Carry-Over to Next Period	0	0	0
	Carry-Over Offset in Next Period	0	0	0
	Net Position	525	68	53

Account Balances

The Account Balances report shows your account balances for each day during the maintenance period.

ACCOUNT BALAN	ICES MAINTENANCE	PERIOD 06/02/2004
Average Accoun Total Account Ba	it Balances (in thousands) alances	900 4,500,281.64
Thursday	05/27/2004	469,766.40
Friday	05/28/2004	1,007,628.81
Saturday	05/29/2004	1,007,628.81
Sunday	05/30/2004	1,007,628.81
Monday	05/31/2004	1,007,628.81
Tuesday	06/01/2004	0.00
Wednesday	06/02/2004	0.00

ReserveCalc



To see information on your as-of adjustments, click this link in the menu.

As-of Adjustments Summary Report

The As-Of Adjustments -Summary report shows your as-of adjustments for each day during the maintenance period. It also shows as-of adjustments applied before and after the period.

For a list of all as-of adustments click on the total.

Average As-of A Total As-of Adjus	djustments (in thousands) stments	-10,327 -144,575,822.82
Thursday	05/20/2004	0.00
Friday	05/21/2004	-149,501,500.00
Saturday	05/22/2004	0.00
Sunday	05/23/2004	0.00
Monday	05/24/2004	8,332,333.33
Tuesday	05/25/2004	0.00
Wednesday	05/26/2004	0.00
Applied on a Date	e Before this Maintenance Peri	od Began <u>-3,431,656.15</u>
	e After this Maintenance Perioo	

As-of Adjustments Detail

AS-OF ADJUSTMENTS

NEW FEATURE:

For detailed information on an individual as-of adjustment, click on the link.

<u>д</u> 5-	UF ADJUSI	MENTS		05/26/2004	
	Date Entered	Date Approved	Date Applied	Amount Entered	Amount Applied
0	5/28/2004	05/28/2004	05/28/2004	50,000.00	25,000.00
0	5/24/2004	05/24/2004	05/24/2004	10,000,000.00	5,000,000.00
0	5/24/2004	05/24/2004	05/24/2004	10,000,000.00	3,333,333.33
0	5/24/2004	05/24/2004	05/24/2004	-1,000.00	-1,000.00
0	5/21/2004	05/21/2004	05/21/2004	-49,500,000.00	-49,500,000.00
0	5/21/2004	05/21/2004	05/21/2004	-50,000,000.00	-50,000,000.00
0	5/21/2004	05/21/2004	05/21/2004	-50,000,000.00	-50,000,000.00
0	5/21/2004	05/21/2004	05/21/2004	-500.00	-500.00
0	5/21/2004	05/21/2004	05/21/2004	-1,000.00	-1,000.00
0	4/30/2004	04/30/2004	04/30/2004	-55,030.00	-275,150.00
0	4/30/2004	04/30/2004	04/30/2004	-450,929.45	-3,156,506.15

MAINTENANCE PERIOD

As-of Adjustments Detail

NEW FEATURE:

Detailed information for an individual as-of adjustment includes items such as the reason code and a description.

iginating ABA 122	999999		
ervicing FRB 122 enultimate ABA	-Los Angeles		
From 04/13/2004 To 04/19/2004		CCWU Batch	6101 20003
Days 7	Aggregate	Trancode Reason	15298 DI Error (3)
Entry Amount -450,929.45	Amount -3,156,506.15	Float	Float
Description			

ReserveCalc



Next, let's request a Requirement Report by clicking here.

Requirement Report

	REQUIREMENT	MAINTENA	NCE PERI	OD 05/26/2004
		Point in Time:	Now	•
The Requirement				
report shows your		Daily Average		Daily Average
	Deposit Data Status: Revised Final	Deposits	Applied	Requirement
Requirement, Reserves to be	Reservable Liabilities From: 04/13/	2004 - 04/26/2004		
Maintained and	Net Transaction Accounts	2004 - 04/26/2004		
Total Balance to	Exempt	6,600		
be Maintained	Up to 38,800	38,800	3	1,164
with the FRB.	Over 38,800	92,303	10	9,230
with the rite.	Gross Reserve Requirement			10,394
	Less Tranche Loss Adjustment			0
	Net Total Reserve Requirement			10,394
	Reported Vault Cash	3,796		
	Less Usable Vault Cash			3,796
	Reserves to be Maintained			6,598
	Clearing Balance Requirement			150
	Total Balance to be Maintained	with the FRB San Franc	isco	6,748

...and a glossary pops up

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<u>File Edit View Go</u> Communicator <u>H</u>elp

Data Status Definitions

Final:

The FR2900/FR2900Q report(s) for this period has been entered.

Revised Final:

The FR2900/FR2900Q report(s) for this period has been entered and revised.

Estimated:

The FR2900/FR2900Q report(s) entered for this period is estimated data.

Revised Estimated:

Requirement Report

	REQUIREMENT	MAINTEN	ANCE PERIOD 0	5/26/2004
New Feature:		Point in Time:	Now Now	•
The default "Point In Time" for Requirement	<u>Deposit Data Status:</u> Revised Final	Daily Average Deposits	05/24/2004 En 05/04/2004 En	-
reports is "Now,"	Reservable Liabilities From: 04/13/	2004 - 04/26/2004		
showing you the	Net Transaction Accounts			
most up-to-date	Exempt	6,600		
information	Up to 38,800	38,800	3	1,164
available. To view a report generated at a point in time in the past, select a date from the pulldown menu.	Over 38,800	92,303	10	9,230
	Gross Reserve Requirement			10,394
	Less Tranche Loss Adjustment			0
	Net Total Reserve Requirement			10,394
	Reported Vault Cash	3,796		
	Less Usable Vault Cash			3,796
	Reserves to be Maintained			6,598
	Clearing Balance Requirement			150
	Total Balance to be Maintained	with the FRB San Franc	cisco	6,748

Requirement Report

	REQUIREMENT	MAINTENA	NCE PERI	OD 05/26/2004
\square		Point in Time:	Now	
To see detail on				
the Reservable		Daily Average	Percent	Daily Average
Liabilities	Deposit Data Status: Revised Final	Deposits	Applied	Requirement
associated with				
	Reservable Liabilities From: 04/13/3	2004 - 04/26/2004		
Report, click here.	Net Transaction Accounts			
2	Exempt 🥏	6,600		
	Up to 38,800	38,800	3	1,164
	Over 38,800	92,303	10	9,230
	Gross Reserve Requirement			10,394
	Less Tranche Loss Adjustment			0
	Net Total Reserve Requirement			10,394
	Reported Vault Cash	3,796		
	Less Usable Vault Cash			3,796
	Reserves to be Maintained			6,598
	Clearing Balance Requirement			150
	Total Balance to be Maintained	with the FRB San Franc	isco	6,748

Reservable Liabilities

	RESERVABLE LIABILITIES	M	AINTENANCE PERIOD 05/26/2004	
	Report	Aggregate Amounts for Computation Period		
	Item	04/19/2004	04/26/2004	
The Reservable Liabilities report shows data from your FR2900 report that were	Deposits			
	A.1.a	0	0	
	A.1.b	487	217	
	A.1.c	749,170	761,841	
	A.2	289,270	286,725	
	B.1	9,371	0	
used to calculate	B.2	69,490	81,007	
your reserve	E.1	26,630	26,507	
requirement.	F.2	0	0	
Dic.	AA1	0	0	
	AA2	0	0	
	Eurocurrency			
	Foreign Borrowing	0	0	
	Liabilities To Own	0	0	
	Claims On Own	0	0	
	Total Assets	0	0	
	Assets Acquired	0	0	
	Credit Extended	0	0	

...and a glossary pops up

💥 Netscape

<u>File Edit View Go Communicator Help</u>

Reservable Liabilities Report Item Names

A1A:

Due to Depository Institutions.

A1B:

Of U.S. Government.

A1C:

Other Demand.

A2:

ATS Accounts and NOW Accounts/Share Drafts, and Telephone and Preauthorized Transfers.

Correspondent and a Pass-through Requirement

	CORRESPONDENT AND PASS-TH REQUIREMENT	IROUGH MAINTENA	NCE PERI	OD 05/26/2004	
New Feature: For	Deposit Data Status: Final	Daily Average Deposits	Percent Applied	Daily Average Requirement	
correspondents, the requirement					
	Net Transaction Accounts				
report shows	Exempt	6,600			
your own	Up to 38,800	38,800	3	1,164	
required	Over 38,800	229,585	10	22,959	
balance and	Gross Reserve Requirement			24,123	
	Less Tranche Loss Adjustment			0	
that of your	Net Total Reserve Requiremen	t		24,123	
respondents.	Reported Vault Cash	38,541			
	Less Usable Vault Cash			24,123	
	Reserves to be Maintained			0	
	Clearing Balance Requirement			15,000	
	Own Balance to be Maintained with FRB San Francisco			15,000	
	1 of 1 Weekly Respondents - Reserves to	be Maintained	1	<u>Final 0</u>	
	3 of 3 Quarterly Respondents - Reserves	to be Maintained		Final 454	
\square	Own and Respondent Balance to be I	Maintained with FRB San Franci	sco	Final 15,454	

Correspondent and a Pass-through Requirement

WEEKLY RESPONDENTS Deposit **Usable Required** Net Reserve Data Vault Balance ABA Requirement Name Status New Feature: Cash This the lower No Reserve 124999999 Final part of the Requirement Requirement report for a QUARTERLY RESPONDENTS correspondent. It Usable Average Vault Required Deposit provides Quarterly Net Reserve Data MP requirement ABA / Name Requirement Balance Status Cash Ending information for each respondent. 05/19/2004 RR Met by Vault Cash 124199999 05/26/2004 RR Met by Vault Cash Final 124300999 722 05/19/2004 495 722 05/26/2004 495 227 Final No Reserve

05/19/2004

Requirement

124399999

ReserveCalc



Next, let's explore Position History. To request the Position History starting from 12/23/2003, select this date from the pulldown menu and click on the Position History link.

Position History

The Position History report shows your position for each maintenance period. Let's drill down to find out more detail on this deficiency on 03/31/2004.

Click on the link to retrieve the Position report.

POSITION HISTORY			MAI	MAINTENANCE PERIOD 12/24/2003		
Maintenance Period End Date	Final Position	<u>Clearing</u> <u>Balance</u> Deficiency <u>I</u> <u>Charge</u>		Tota	l <u>Charge</u> Charge Disposition Date	
06/09/2004	1,092*	N/A	N/A	N/A		
05/26/2004	<u>0</u> *	N/A	N/A	N/A		
05/12/2004	<u>0</u> *	N/A	N/A	N/A		
04/28/2004	<u>0</u>	0.00	0.00	0.00		
04/14/2004	<u>0</u>	0.00	0.00	0.00		
03/31/2004	-77	95.12	0.00	95.12	Charged 05/19/2004	
03/17/2004	<u>0</u>	0.00	0.00	0.00		
03/03/2.004	<u>0</u>	0.00	0.00	0.00		
02/18/2004	<u>0</u>	0.00	0.00	0.00		
02/04/2004	338	0.00	0.00	0.00		
01/21/2004	<u>0</u>	0.00	0.00	0.00		
01/07/2004	140	0.00	0.00	0.00		
12/24/2003	<u>0</u>	0.00	0.00	0.00		

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Final Position Report

The Final Position Report shows detailed position information including Total Requirement, Total Maintained, Gross Position and Net Position.

POSITION - FINAL DIRECT	MAINTENANCE PERIOD 03/31/2004		
Reserve Requirement	706		
Clearing Balance Requirement	150		
Total Requirement	856		
Usable Vault Cash	235		
Account Balances	494		
As-of Adjustments	<u>0</u>		
Total Maintained	729		
Gross Position	-127		
Carry-Over from Prior Period	0		
Clearing Balance Allowance	-25		
Subtotal	-102		
Allowable Carry-Over to Next Period	-25		
Carry-Over Offset in Next Period	-25		
Net Position	-77		

The following deficiency charge was assessed on 05/19/2004:

Clearing Balance Deficiency	Charge Calculated @	2.0%	23.01
Clearing Balance Deficiency	Charge Calculated @	4.0%	72.11

Key Points

- Access ReserveCalc anytime for report information
- View reserve requirement on-line (no need to wait for scheduled reports)
- Use the Balance Calculator to calculate target balances
- Drill down for information
- Point and click for information
- Includes on-line Help Features (explains terminology and calculations)

For More Information

Visit ReserveCalc on the Reporting and Reserves Website at: <u>www.reportingandreserves.org</u>

For more information on an existing EUAC, or how to designate a EUAC at your institution, please contact the Customer Contact Center (CCC) at (800) 333-2690 or (816) 881-2698. You can send your completed subscriber forms via fax to (800) 485-6089, or email to <u>ccc.coordinators@kc.frb.org</u>. The original EUAC form should be sent via mail to:

Customer Contact Center P.O. Box 219416 Kansas City, MO 64121-9416

Upon receipt of your forms, the CCC staff will provide instructions on how to download your digital certificate and the URL for ReserveCalcTM. Once that is completed, you will have access to ReserveCalcTM and can begin to take advantage of its information features. If you have any questions regarding ReserveCalcTM, please contact Eartha Collins, District Coordinator, at (212) 720-5993.

Appendix: Schedule CC Detailed Instructions



Schedule CC

• The main purpose of Schedule CC is to calculate the Eurocurrency Liabilities portion of reservable liabilities, which are used to index the growth in reservable liabilities from June 30 to June 30.

Schedule CC

- Schedule CC data are to be completed based on the following schedule:
 - For weekly FR 2900 respondents: for the weekly report that includes June 30
 - For quarterly FR 2900 respondents: for the June report

Worksheet for Preparation of Schedule CC

- Part of the FR 2900 instructions:
 - For U.S. branches and agencies of foreign banks, refer to Pg. 65
 - For commercial banks and savings institutions, refer to Pg. 64
 - For credit unions, refer to Pg. 60

International Banking Facility (IBF)

- IBFs were first permitted in 1981 to enable depository institutions located in the U.S. to compete more effectively for overseas deposits and loans
- An IBF is a separate set of books maintained by a depository institution for a "shell" institution that is chartered in the U.S., but is treated like a related foreign branch

IBF

- IBFs are treated as Non-U.S. offices and are exempt from certain U.S. laws, including:
 - Reserve requirements
 - FDIC insurance assessments
 - Some state and local income taxes



IBF Restrictions

- IBFs are only allowed to extend credit or accept deposits with the following customers:
 - Foreign residents (including banks)
 - Other IBFs
 - The establishing entity



IBF Restrictions

IBFs may only extend credit to and accept deposits from a nonbank customer only if such funds are used to finance the borrower's operations located outside the U.S.


IBF Restrictions

- In order to determine that the use-of-proceed requirement has been met, it is necessary for the IBF to:
 - Ascertain that the applicable IBF notices and acknowledgments have been provided



IBF Deposit Maturities

- IBF deposits must have a minimum maturity:
 - Overnight for foreign banks, other IBFs and the establishing entity
 - Two business days for non-bank foreign residents

IBF Deposit Maturities

- Deposits and withdrawals of nonbank customers must be in the amount of at least \$100 thousand, and,
- IBFs are prohibited from issuing negotiable instruments including Eurodollar CDs and bankers' acceptances

Related vs. Unrelated Institutions



Related vs. Unrelated Institutions (**U.S. Branches and Agencies of Foreign Banks**)

• For Schedule CC, related institutions are:

– Foreign (direct) Parent Bank,

– Offices of the same foreign (direct) Parent Bank

Related vs. Unrelated Institutions (U.S. Branches and Agencies of Foreign Banks)

- U.S. and Non-U.S. affiliates and subsidiaries of the foreign (direct) parent bank are treated as unrelated institutions for purposes of Regulation D, therefore:
 - Deposits, borrowings, loans, and claims from these affiliates and subsidiaries are treated like those from unrelated institutions

Foreign Bank Organizational Chart



Related vs. Unrelated Institutions (all institutions other than U.S. Branches and Agencies of Foreign Banks)

• For Schedule CC, related institutions are:

– Foreign (non-U.S.) branches



296

Worksheet Item 1: Borrowings From Non-U.S. Offices of Other Depository Institutions and From Certain Designated Non-U.S. Entities



Worksheet Item 1: Borrowings From Non-U.S. Offices of Other Depository Institutions and From Certain Designated Non-U.S. Entities

• Depository institutions must report any borrowings from unrelated banking institutions located outside of the U.S.



Worksheet Item 1: Borrowings From Non-U.S. Offices of Other Depository Institutions and From Certain Designated Non-U.S. Entities

- Borrowings from the following depository institutions are reported on Line 1
 - Non-U.S. Banks (located overseas)
 - Overseas branches of U.S. depository institutions
 - International institutions
 - Overseas banking subsidiaries and affiliates of the parent bank

Worksheet Item 1: Borrowings From Non-U.S. Offices of Other Depository Institutions and From Certain Designated Non-U.S. Entities

Exclude borrowings from the reporting institution's Non-U.S. branches or Non-U.S. offices of the parent bank from Worksheet Item 1



Worksheet Item 1: Common Borrowings Reported

- Federal funds or any overnight borrowing from depository institutions located outside the U.S., including international institutions (refer to the FR 2900 glossary)
- Overdrafts
- Repurchase agreements not backed by U.S. government securities



Worksheet Item 1: Common Borrowings Reported

Note: A depository institution should <u>exclude</u> any items reported on the FR 2900 such as CDs, MMDAs and time open accounts.



302



Dotted lines represent borrowings to be reported in Worksheet Item.

Which of the following instruments should be included in Worksheet Item 1?

- a) Overdraft with U.S. correspondent
- b) Repurchase agreement (backed by U.S Gov't securities) with non-U.S. bank
- c) Overnight loan from the World Bank
- d) None of the above

Which of the following instruments should be included in Worksheet Item 1?

- a) Overdraft with U.S. correspondent
- b) Repurchase agreement (backed byU.S Gov't securities) with non-U.S. bank
- c) Overnight loan from the World Bank
- d) None of the above

A borrowing from which of the following institutions is not included in Worksheet Item 1?

- a) Foreign banking subsidiary of the parent
- b) Foreign parent's Cayman Branch
- c) World Bank
- d) Reporting institution's foreign non-bank holding company

A borrowing from which of the following institutions is not included in Worksheet Item 1?

- a) Foreign banking subsidiary of the parent
- b) Foreign parent's Cayman Branch
- c) World Bank
- d) Reporting institution's foreign non-bank holding company

Hint: More than one answer!

Summary

- IBFs
- Related vs. unrelated institutions
- Worksheet Item 1 captures borrowings from foreign entities (including banking subsidiaries of foreign parent's bank holding company)
- Deposits should be excluded from Worksheet Item 1 and reported on the appropriate line on the FR 2900



309

- Worksheet Items 2 and 3
 - Depository institutions report any liabilities or claims they have with their non-U.S. parent and the parent's non-U.S. offices on a gross basis

Worksheet Items 2 and 3 (U.S. Branch or Agency of a Foreign Bank)



- Liabilities due to related parties include:
 - Deposits
 - Borrowings
 - Overdrawn balances
 - A net due to position with own IBF
 - Revaluation losses from derivative products

- Liabilities due to related parties include:
 - Accounts payable
 - Funds swept out of a deposit account to offshore
 - offices booked as a liability to a related foreign office
 - Capital contribution, adjusted for:
 - Unremitted earnings (losses)
 - Provision for loan loss reserves



Based on the balance sheet on the following page, what would be included in Worksheet Item 2?



Mt. Vernon Bank, NY Branch

<u>Assets</u>

Cash and Due From	195,000		Demand Deposits	296,000
CIPC		2,000	IPC	
Vault Cash		1,000	U.S. Banks	
			Foreign Banks	
Due from (demand)			Foreign Official Institutions	
U.S. Banks		10,000	Head Office Paris	
FRB Balances		25,000	Mt. Vernon London	
Mt. Vernon London	10,000 Mt. Vernon Cayman			
Mt. Vernon San Fran		2,000	IBF	
Nonbanking Affiliate		5,000	Nonbanking Affiliate	
Head Office Paris		10,000		
NY IBF		130000	Time and Savings Deposits IPC	248,000
Securities	35,000		U.S. Banks	
U.S. Treasury		35,000	Foreign Banks	
			Foreign Official Institutions	
Loans	548,000		Ç	
Commercial and Industrial		225,000	Borrowings	234,000
U.S. Banks		26,000	U.S. Banks	
Foreign Banks		75,000	Foreign Banks	
Head Office Paris		19,000	Head Office Paris	
Mt. Vernon San Fran		3,000	Mt. Vernon London	
N.Y. IBF		200,000	Mt. Vernon San Fran	
			Mt. Vernon Cayman	
			Foreign Official Institution	
			N.Y. IBF	
Total Assets	778,000		Total Liabilities	778,000

Liabilities

 $10,000 \\ 1,000 \\ 75,000 \\ 50,000 \\ 15,000 \\ 10,000 \\ 25,000 \\ 100,000 \\ 1$

220,000 2,000 1,000 25,000

3,000 5,000 10,000 9,000 4,000 2,000 1,000 200,000 315

Mt. Vernon Bank, NY Branch

Liabilities

Assets

Cash and Due From	195,000		Demand Deposits	296,000	
CIPC		2,000	IPC		10,000
Vault Cash		1,000	U.S. Banks		1,000
			Foreign Banks		75,000
Due from (demand)			Foreign Official Institutions		50,000
U.S. Banks		10,000	Head Office Paris		15,000
FRB Balances		25,000	Mt. Vernon London		10,000
Mt. Vernon London		10,000	Mt. Vernon Cayman		25,000
Mt. Vernon San Fran		2,000	IBF		100,000
Nonbanking Affiliate		5,000	Nonbanking Affiliate		10,000
Head Office Paris		10,000	, i i i i i i i i i i i i i i i i i i i		
NY IBF		130,000	Time and Savings Deposits IPC	248,000	220,000
Securities	35,000		U.S. Banks		2,000
U.S. Treasury	,	35,000	Foreign Banks		1,000
c.s. ficustry		,	Foreign Official Institutions		25,000
Loans	548,000				
Commercial and Industrial		225,000	Borrowings	234,000	
U.S. Banks		26,000	U.S. Banks		3,000
Foreign Banks		75,000	Foreign Banks		5,000
Head Office Paris		19,000	Head Office Paris		10,000
Mt. Vernon San Fran		3,000	Mt. Vernon London		9,000
N.Y. IBF		200,000	Mt. Vernon San Fran		4,000
			Mt. Vernon Cayman		2,000
			Foreign Official Institution		1,000
			N.Y. IBF		200,000
Total Assets	778,000		Total Liabilities	778,000	316

Worksheet Item 3 - Gross Claims on Non-U.S. Parent Bank and Its Non-U.S. Offices Plus Net Claims on Own IBF

- Claims due from related parties include:
 - Placements
 - Loans
 - A net due from position with own IBF
 - Overdrawn balances
 - Accounts receivable
 - Revaluation gains from derivative products

Worksheet Item 3 - Gross Claims on Non-U.S. Parent Bank and Its Non-U.S. Offices Plus Net Claims on Own IBF

Based on the balance sheet on the following page, what would be included in Worksheet Item 3?



318

Mt. Vernon Bank, NY Branch

<u>Assets</u>

<u>Liabilities</u>

Cash and Due From	195,000		Demand Deposits	296,000
CIPC		2,000	IPC	10,000
Vault Cash		1,000	U.S. Banks	1,000
			Foreign Banks	75,000
Due from (demand)			Foreign Official Institutions	50,000
U.S. Banks		10,000	Head Office Paris	15,000
FRB Balances		25,000	Mt. Vernon London	10,000
Mt. Vernon London		10,000	Mt. Vernon Cayman	25,000
Mt. Vernon San Fran		2,000	IBF	100,000
Nonbanking Affiliate		5,000	Nonbanking Affiliate	10,000
Head Office Paris		10,000		
NY IBF		130000	Time and Savings Deposits	248,000
			IPC	220,000
Securities	35,000		U.S. Banks	2,000
U.S. Treasury		35,000	Foreign Banks	1,000
			Foreign Official Institutions	25,000
Loans	548,000			
Commercial and Industrial		225,000	Borrowings	234,000
U.S. Banks		26,000	U.S. Banks	3,000
Foreign Banks		75,000	Foreign Banks	5,000
Head Office Paris		19,000	Head Office Paris	10,000
Mt. Vernon San Fran		3,000	Mt. Vernon London	9,000
N.Y. IBF		200,000	Mt. Vernon San Fran	4,000
			Mt. Vernon Cayman	2,000
			Foreign Official Institution	1,000
			N.Y. IBF	200,000
Total Assets	778,000		Total Liabilities	778,000 319

Mt. Vernon Bank, NY Branch

Liabilities

<u>Assets</u>

Demand Deposits Cash and Due From 195.000 296.000 IPC CIPC 2,000 10,000 Vault Cash 1,000 U.S. Banks 1.000 Foreign Banks 75,000 Due from (demand) Foreign Official Institutions 50,000 U.S. Banks 10.000 Head Office Paris 15,000 25,000 **FRB** Balances Mt. Vernon London 10,000 Mt. Vernon Cayman Mt. Vernon London 10,000 25,000 Mt. Vernon San Fran IBF 2.000 100.000 5,000 Nonbanking Affiliate Nonbanking Affiliate 10,000 Head Office Paris 10,000 Time and Savings Deposits 248,000 NY IBF 130000 IPC 220,000 Securities 35,000 U.S. Banks 2,000 Foreign Banks U.S. Treasury 35,000 1,000 Foreign Official Institutions 25,000 Loans 548.000 Commercial and Industrial Borrowings 225,000 234,000 U.S. Banks U.S. Banks 26.000 3.000 75,000 5,000 Foreign Banks **Foreign Banks** Head Office Paris 19,000 Head Office Paris 10,000 Mt. Vernon San Fran 3,000 Mt. Vernon London 9.000 N.Y. IBF 200,000 Mt. Vernon San Fran 4,000 Mt. Vernon Cayman 2.000 Foreign Official Institution 1,000 N.Y. IBF 200,000 778,000 320 **Total Liabilities Total Assets** 778,000



321

- The net IBF position is the net credit or debit position reflected on the IBF books with the establishing entity.
- This should be the difference between the IBF's assets and liabilities excluding those with U.S. offices of the establishing entity.

• The net IBF position should be included in either Worksheet Item 2 (if a net due to) or Worksheet Item 3 (if a net due from)



IBF Balance Sheet

Assets

Third-party Assets Due From NY Branch

Total Assets

Liabilities

Third-party Liabilities Due To NY Branch Net Profit

Total Liabilities

Net Calculation

Liabilities to parties other than U.S.MinusAssets DF parties other than U.S. offices of the
offices of the establishing entity

324
Net IBF Position

Which items on the preceding balance sheet would be considered third party assets or third party liabilities?



325

Vario Bank, NY IBF's Books

Assets

Liabilities

Cash and Due From :	121,500	Deposits :	368,000
Vario N.Y. 10 Foreign Official Inst. Vario San Fran IBF Vario London	0,000 00,000 500 1,000 5,000 5,000	Foreign Banks Vario N.Y. Foreign Official Inst. IPC	10,000 250,000 75,000 33,000
Securities Foreign Treasury 22 Other Bonds and notes	22,000 2,000 2,000	Borrowings: Foreign Banks Vario N.Y. Vario London Vario Cayman Other IBFs	265,500 25,000 200,000 7,000 3,000 25,500
Foreign Banks5Foreign Official Inst2Vario London2Vario Cayman2Vario San Fr IBF2	490,000 92,000 51,000 20,000 25,000 25,000 25,000 25,000 25,000 25,000 25,000 25,000	Net profit (due to NY Branch)	5,000
Total Assets	633,500	Total Liabilities	326 633,500

Vario Bank, NY IBF's Books

Assets

Liabilities

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Cash and Due From :		121,500	Deposits :	368,000	
<i>Foreign Banks</i> Vario N.Y. <i>Foreign Official Inst.</i> Vario San Fran IBF Vario London Vario Cayman	10,000 100,000 500 1,000 5,000 5,000		<i>Foreign Banks</i> Vario N.Y. <i>Foreign Official Inst.</i> <i>IPC</i>	10,000 250,000 75,000 33,000	
Securities Foreign Treasury Other Bonds and notes	20,000 2,000	22,000	Borrowings: <i>Foreign Banks</i> Vario N.Y. <i>Vario London</i> <i>Vario Cayman</i> <i>Other IBFs</i>	265,500 25,000 200,000 7,000 3,000 25,500	
Loans : Comm. and Indus Foreign Banks Foreign Official Inst Vario London Vario Cayman Vario San Fr IBF Vario N.Y.	292,000 51,000 20,000 25,000 25,000 20,000 57,000	490,000	Net profit (due to NY Branch)	5,000	
Total Assets		633,500	Total Liabilities	633,500	327

Net IBF Position

IBF Balance Sheet

Assets		Liabilities				
Third-party Assets	476,500	Third-party Liabilities	178,500			
Due From NY Br.	157,000	Due To NY Br.	450,000			
		Net Profit	5,000			
Total Assets	633,500	Total Liabilities	633,500			
Net Calculation						
Liabilities to parties other than U.S.MinusAssets due from parties other than U.Soffices of the establishing entityoffices of the establishing entity						
	178,500		476,500			
	(298,0	00)	328			

Net IBF Position

- Because the difference calculated is negative, its absolute value represents, on the books of the IBF, net balances due to U.S. offices of the establishing entity.
- For purposes of this report, its absolute value represents the establishing entity's net claims on its own IBF and should be included in Worksheet Item 3.

Worksheet Item 4: Total Assets Minus Certain Assets and Positive Net Balances Due From Own IBF and the Parent Bank's U.S. and Non-U.S. Offices (U.S. Branches and Agencies of Foreign Banks)



Worksheet Item 4: Total Assets Minus Certain Assets and Positive Net Balances Due From Own IBF and the Parent Bank's U.S. and Non-U.S. Offices (U.S. Branches and Agencies of Foreign Banks)

- U.S. branches and agencies report their risk adjusted assets on this line
- The purpose of this column is to give U.S. branches and agencies a deduction for their reservable Eurocurrency liabilities (funds placed by their parent as capital contribution)







Worksheet Item 4: Total Assets Minus Certain Assets and Positive Net Balances Due From Own IBF and the Parent Bank's U.S. and Non-U.S. Offices (U.S. Branches and Agencies of Foreign Banks)

- U.S. depository institution's capital is exempt from reserve requirements
- The capital equivalency deduction allows for reserve requirements to be imposed evenly on U.S. banks and U.S. branches and agencies of foreign banks

Worksheet Item 4: Total Assets Minus Certain Assets and Positive Net Balances Due From Own IBF and the Parent Bank's U.S. and Non-U.S. Offices (U.S. Branches and Agencies of Foreign Banks)

- Total assets are adjusted to calculate "risk" assets by deducting certain assets from the institutions total assets. These are:
 - Demand balances due from depository institutions in the U.S. (FR 2900, Line B.1)
 - Cash items in the process of collection (FR 2900, Line B.2)

Worksheet Item 4: Total Assets Minus Certain Assets and Positive Net Balances Due From Own IBF and the Parent Bank's U.S. and Non-U.S. Offices (U.S. Branches and Agencies of Foreign Banks)

Demand balances due from non-U.S. offices of U.S. depository institutions and overseas banks

– Balances due from foreign official institutions



Worksheet Item 4: Total Assets Minus Certain Assets and Positive Net Balances Due From Own IBF and the Parent Bank's U.S. and Non-U.S. Offices (U.S. Branches and Agencies of Foreign Banks)

 Gross claims on related institutions are not included in the total assets used to calculate Worksheet Item 4



Worksheet Item 4: Total Assets Minus Certain Assets and Positive Net Balances Due From Own IBF and the Parent Bank's U.S. and Non-U.S. Offices (U.S. Branches and Agencies of Foreign Banks)

- In general the definition of "total assets" corresponds to the total assets reported on Schedule RAL on the FFIEC 002.
- The total assets to be used in Worksheet Item 4 will differ from the total assets on the FFIEC 002 due to the following
 - U.S. and non-U.S. affiliates and subsidiaries are considered unrelated for purposes of the FR 2900 and related for the FFIEC 002

Worksheet Item 4: Total Assets Minus Certain Assets and Positive Net Balances Due From Own IBF and the Parent Bank's U.S. and Non-U.S. Offices (U.S. Branches and Agencies of Foreign Banks)

 IBF assets due from parties other than U.S. offices of the establishing entity are excluded from the calculation of the amount reported in Worksheet Item 4, but are included on the FFIEC 002.



Common Problems Found With Worksheet Item 4

- The following are common <u>errors</u> associated with Worksheet Item 4
 - IBF assets are included with total assets of the branch/agency
 - Reserve balances and vault cash are excluded from total assets
 - Failure to reduce total assets figure by the deduction items
 - Related party claims are included in the calculation

Step 1

Deduct the Gross Due From related parties figure from the total assets figure on the balance sheet

Total Assets - Gross Due From Related = Third Party Assets



Step 1

Calculate gross due from related parties (including IBF)

Due from:

Loans to:

Gross due from:



Mt. Vernon Bank, NY Branch

Assets

Liabilities

Cash and Due From	195,000		Demand Deposits	296,000	
CIPC		2,000	IPC		10,000
Vault Cash		1,000	U.S. Banks		1,000
			Foreign Banks		75,000
Due from (demand)			Foreign Official Institutions		50,000
U.S. Banks		10,000	Head Office Paris		15,000
FRB Balances		25,000	Mt. Vernon London		10,000
Mt. Vernon London		10,000	Mt. Vernon Cayman		25,000
Mt. Vernon San Fran		2,000	IBF		100,000
Nonbanking Affiliate		5,000	Nonbanking Affiliate		10,000
Head Office Paris		10,000			
NY IBF		130,000	Time and Savings Deposits	248,000	
			IPC		220,000
Securities	35,000		U.S. Banks		2,000
U.S. Treasury		35,000	Foreign Banks		1,000
			Foreign Official Institutions		25,000
Loans	548,000				
Commercial and Industrial		225,000	Borrowings	234,000	
U.S. Banks		26,000	U.S. Banks		3,000
Foreign Banks		75,000	Foreign Banks		5,000
Head Office Paris		19,000	Head Office Paris		10,000
Mt. Vernon San Fran		3,000	Mt. Vernon London		9,000
N.Y. IBF		200,000	Mt. Vernon San Fran		4,000
			Mt. Vernon Cayman		2,000
			Foreign Official Institution		1,000
			N.Y. IBF		200,000
Total Assets	778,000		Total Liabilities	778,000	341

Mt. Vernon Bank, NY Branch

Assets

Liabilities

Cash and Due From	195,000		Demand Deposits	296,000	
CIPC		2,000	IPC		10,000
Vault Cash		1,000	U.S. Banks		1,000
			Foreign Banks		75,000
Due from (demand)			Foreign Official Institutions		50,000
U.S. Banks		10,000	Head Office Paris		15,000
FRB Balances		25,000	Mt. Vernon London		10,000
Mt. Vernon London		10,000	Mt. Vernon Cayman		25,000
Mt. Vernon San Fran		2,000	IBF		100,000
Nonbanking Affiliate		5,000	Nonbanking Affiliate		10,000
Head Office Paris		10,000	C		
NY IBF		130,000	Time and Savings Deposits	248,000	
			IPC		220,000
Securities	35,000		U.S. Banks		2,000
U.S. Treasury		35,000	Foreign Banks		1,000
			Foreign Official Institutions		25,000
Loans	548,000		Ç		
Commercial and Industrial		225,000	Borrowings	234,000	
U.S. Banks		26,000	U.S. Banks		3,000
Foreign Banks		75,000	Foreign Banks		5,000
Head Office Paris		19,000	Head Office Paris		10,000
Mt. Vernon San Fran		3,000	Mt. Vernon London		9,000
N.Y. IBF		200,000	Mt. Vernon San Fran		4,000
			Mt. Vernon Cayman		2,000
			Foreign Official Institution		1,000
			N.Y. IBF		200,000
Total Assets	778,000		Total Liabilities	778,000	342

Step 1

HO

NY IBF

Due from:	\$152,000
London	\$10,000
SF	\$2,000
НО	\$10,000
NY IBF	\$130,000
Loans to:	\$222,000
SF	\$3,000

\$19,000

\$200,000



343

Step 1

Deduct the Gross Due From related parties balance from the total assets figure on the balance sheet

> Total Assets - Gross Due From Related = Third Party Assets

> > 778,000 - 374,000 = 404,000

<u>Step 2</u>

Calculate other deductions

- 1) Cash items in the process of collection
- 2) Demand balances due from U.S. banks
- 3) Demand balances due from foreign banks
- 4) Foreign official institutions

Total Other Deductions =



Mt. Vernon Bank, NY Branch

Assets

Liabilities

Cash and Due From	195,000		Demand Deposits	296,000	
CIPC		2,000	IPC		10,000
Vault Cash		1,000	U.S. Banks		1,000
			Foreign Banks		75,000
Due from (demand)			Foreign Official Institutions		50,000
U.S. Banks		10,000	Head Office Paris		15,000
FRB Balances		25,000	Mt. Vernon London		10,000
Mt. Vernon London		10,000	Mt. Vernon Cayman		25,000
Mt. Vernon San Fran		2,000	IBF		100,000
Nonbanking Affiliate		5,000	Nonbanking Affiliate		10,000
Head Office Paris		10,000			
NY IBF		130000	Time and Savings Deposits	248,000	
			IPC		220,000
Securities	35,000		U.S. Banks		2,000
U.S. Treasury		35,000	Foreign Banks		1,000
			Foreign Official Institutions		25,000
Loans	548,000				
Commercial and Industrial		225,000	Borrowings	234,000	
U.S. Banks		26,000	U.S. Banks		3,000
Foreign Banks		75,000	Foreign Banks		5,000
Head Office Paris		19,000	Head Office Paris		10,000
Mt. Vernon San Fran		3,000	Mt. Vernon London		9,000
N.Y. IBF		200,000	Mt. Vernon San Fran		4,000
			Mt. Vernon Cayman		2,000
			Foreign Official Institution		1,000
			N.Y. IBF		200,000
Total Assets	778,000		Total Liabilities	778,000	346

Mt. Vernon Bank, NY Branch

Assets

Liabilities

Cash and Due From	195,000		Demand Deposits	296,000	
CIPC		2,000	IPC		10,000
Vault Cash		1,000	U.S. Banks		1,000
			Foreign Banks		75,000
Due from (demand)			Foreign Official Institutions		50,000
U.S. Banks		10,000	Head Office Paris		15,000
FRB Balances		25,000	Mt. Vernon London		10,000
Mt. Vernon London		10,000	Mt. Vernon Cayman		25,000
Mt. Vernon San Fran		2,000	IBF		100,000
Nonbanking Affiliate		5,000	Nonbanking Affiliate		10,000
Head Office Paris		10,000			
NY IBF		130000	Time and Savings Deposits	248,000	
			IPC		220,000
Securities	35,000		U.S. Banks		2,000
U.S. Treasury		35,000	Foreign Banks		1,000
			Foreign Official Institutions		25,000
Loans	548,000				
Commercial and Industrial		225,000	Borrowings	234,000	
U.S. Banks		26,000	U.S. Banks		3,000
Foreign Banks		75,000	Foreign Banks		5,000
Head Office Paris		19,000	Head Office Paris		10,000
Mt. Vernon San Fran		3,000	Mt. Vernon London		9,000
N.Y. IBF		200,000	Mt. Vernon San Fran		4,000
			Mt. Vernon Cayman		2,000
			Foreign Official Institution		1,000
			N.Y. IBF		200,000
Total Assets	778,000		Total Liabilities	778,000	347

- **Step 2** Calculate other deductions
- 1) Cash items in the process of collection \$2,000
- 2) Demand balances due from U.S. banks \$10,000
- 3) Demand balances due from fgn. banks
- 4) Balances due from from fgn. official inst.

Total Other Deductions = **\$12,000**



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Step 3 Calculate Total Adjusted Assets

Step 1 - Step 2 =

Total Assets reported in Worksheet Item 4



Step 3 Calculate Total Adjusted Assets

Step 1 - Step 2 =

Total Assets reported in Worksheet Item 4

404,000 - 12,000 = 392,000

Worksheet Item 4 (all institutions other than U.S. Branches and Agencies of Foreign Banks) and Worksheet Item 5 (U.S. Branches and Agencies of Foreign Banks): Assets held by own IBF and Non-U.S. Offices Acquired from U.S. Offices



 Depository institutions report in this item funds that are supplied to them by foreign related institutions or its own IBF through the sale of assets



- Funds received by the depository institution will continue to be reported in this item until the foreign related institution disposes of the asset
- Assets given to the IBF to start its operations for the first two fourteen day computation periods from its opening should be excluded from this line

Mt. Vernon Bank, NY branch sells loans to Mt. Vernon Bank, Paris at a book value of \$10 million for \$5 million.



What should be reported on Worksheet Item 5?



Mt. Vernon Bank, Paris pays \$5 million for the loans.Mt. Vernon Bank, NY reports \$5 million in line 5.



355

Worksheet Item 5: Credit Extended by Own Non-U.S. Branches to U.S. Residents (all institutions other than U.S. Branches and Agencies of Foreign Banks)

- Include in this item the amount of credit extended by the reporting institutions' non-U.S. branches to U.S. residents
- Exclude credit extended if:
 - Amount by a single non-U.S. branch did not exceed \$1 million, or
 - Amount by all non-U.S. branches did not exceed $$100,000_{356}$

Summary

- Liabilities and Claims with Non-U.S. Parent and its Non-U.S. offices Plus Net IBF Position
- Net IBF Position
- Capital Contribution
- Total Assets