

Norm.Nelson

From: Gail.Haas
Sent: Friday, June 15, 2007 10:12 AM
To: Ken Lamar
Cc: Committee Regulatory Reporting
Attachments: Y-9CG-LP Proposed Changes.doc

Ken,

At our annual meeting on May 15, 2007, you requested that we send to you our proposal to reduce the regulatory burden on the reporting of cash flow statement and memorandum section on the FR Y-9LP. In that regard, I have attached our proposal for your review.

If you are in need of further information or have any questions, please call me at (212) 612-9233.

Best regards,

Gail Haas

Parent Company Only Financial Statements For Large Bank Holding Companies- FR Y-9LP

A. For *Schedule PI-A- Cash Flow Statement*, we propose that the following lines be reported *net*. We conduct numerous daily inter-company and short-term borrowing transactions that are burdensome to capture on a *gross basis*. Reporting these items *net* would be comparable to the disclosures provided on the 10K/10Q.

Part II. Cash Flow from Investing Activities:

3. Payments for investments in and advances to subsidiaries
4. Sale or repayment of investments in and advances to subsidiaries

Proposed Line:

Changes in investments and advances to subsidiaries

Part III. Cash Flow from Financing Activities:

1. Proceeds from purchased funds and other short-term borrowings
2. Repayments of purchased funds and other short-term borrowings

Proposed Line:

Net change in purchased funds and other short-term borrowings

3. Proceeds from advances from subsidiaries
4. Repayment of advances from subsidiaries

Proposed Line:

Net change in advances from subsidiaries

B. For *Schedule PC-B Memoranda*, we request that the following lines be reviewed to determine if this information is still needed. This data is not disclosed in other primary financial reporting therefore it is not automatically populated in our reporting systems. Multiple additional accounts are compiled to gather this information requiring substantial effort and resources. Removing these reporting lines on the Memoranda section would relieve some burden for Parent Company Reporting.

12. Balances held by subsidiary banks of the bank holding company due from:

- a. Other bank subsidiaries of the bank holding company
- b. Nonbank subsidiaries of the bank holding company

13. Balances held by subsidiary banks of the bank holding company due to:

- a. Other bank subsidiaries of the bank holding company
- b. Nonbank subsidiaries of the bank holding company

15. (To be completed only by the top-tier bank holding company for its consolidated nonbank and thrift subsidiaries)

- a. Total combined nonbank assets of nonbank subsidiaries
- b. Total combined loans and leases of nonbank subsidiaries
- c. Total aggregate operating revenue of nonbank subsidiaries
- d. Combined thrift assets included in 15.a
- e. Combined foreign nonbank subsidiary assets included in 15.a
- f. Number of nonbank subsidiaries included in 15.a
- g. Number of thrift subsidiaries included in 15.d
- h. Number of foreign nonbank subsidiaries included in 15.e