

Proposal: Call Reports FFIEC, 031,041, and 051 (ICP 202345 Pub'd 12/27/23)

Description:

---

Comment ID: 158515

From: Mizuho Bank , Helen Fung

Proposal: Call Reports FFIEC, 031,041, and 051 (ICP 202345 Pub'd 12/27/23)

Subject: Call Reports FFIEC, 031,041, and 051 Consolidated Reports of Condition and Income.

---

Comments:

NONCONFIDENTIAL // EXTERNAL

Dear Board of Governors,

Regarding the proposed changes in FFIEC002 and FFIEC031 that posted in Federal Register / Vol. 88, No. 247 on December 27, 2023, we would like to request a more clear instruction on the following items:

1. a complete definition of "securities";
2. a complete definition of "margin loans" - since FR U-1 only covers margin stock that is equity securities, please clarify if we should also report margin loans on debt securities;
3. a clear instruction on how to report loans to Non Depository Financial Institutions ("NDFI") for specific loans purpose such as for margin loans, carrying and purchasing securities or for construction of own office building purposes, current language in the instructions do not seem to consider specific loan purpose for loans to NDFI

Thank you.

Helen Fung

Mizuho Bank (USA)

Mizuho Bank New York Branch