

February 13, 2024

Ms. Ann E. Misback  
Secretary, Board of Governors of the Federal Reserve System  
20th Street and Constitution Avenue, NW  
Washington, DC 20551

RE: Federal Register notice of January 19, 2024, for the Form FFIEC 030 or FFIEC 030S, the Foreign Branch Report of Condition and the Abbreviated Foreign Branch Report of Condition (OMB Number: 1557-0099)

Dear Ms. Misback:

The Bureau of Economic Analysis (BEA) strongly supports the continued collection of data that are currently being collected on the FR 2502q, which is to be discontinued, and proposed to be collected in part on the FFIEC 030. The data collected on the FR 2502q are important contributors to components of BEA's economic statistics.

BEA uses information from the FR 2502q directly in the U.S. international transactions accounts. The FR 2502q, as currently constructed, is a unique data source that contributes to our statistical coverage of U.S. external claims and liabilities of nonbanking concerns vis-a-vis Caribbean financial centers (ITA Table 1.2 lines 78 and 103). In the current data collection, the data for Caribbean financial centers includes reporting on both large foreign branches and large banking subsidiaries of U.S. head offices of bank holding companies and commercial banks. The proposal would add the line items of the FR 2502q to the FFIEC 030, which currently reports on large foreign branches. A list of specific items that are used by BEA is attached, referencing both the current line items on the FR 2502q and the proposed line items on the FFIEC 030.

BEA supports the revision to the FFIEC 030 with the understanding that the data coverage on the new version of the FFIEC 030 for large foreign branches will be identical to the coverage on the current FR 2502q form and that there will be no loss in data quality. Furthermore, in the federal register notice, the agencies noted that a similar revision is proposed for the FR 2314 (which reports on large banking subsidiaries) which will be published in a separate notice. The coverage of large banking subsidiaries is also a crucial component of the FR 2502q for BEA, so the proposed revisions to the FR 2314 should also ensure that there is no loss in data quality.

Please keep BEA informed about any modifications to these forms. We are particularly interested in any modifications proposed during the forms' approval process that would substantially affect our use of these data. For additional information, please contact Tiffany Burrell, Source Data Coordinator, on (301) 278-9618 or by e-mail at [Tiffany.Burrell@bea.gov](mailto:Tiffany.Burrell@bea.gov). Should you need assistance in justifying this survey to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,

**DENNIS FIXLER** Digitally signed by DENNIS FIXLER  
Date: 2024.02.14 12:50:39 -05'00'

Dennis J. Fixler  
Chief Economist

Attachment

## ATTACHMENT

### Current Use of FR2502q in BEA's Accounts

Items	Used in Estimation of
FR 2502q Assets 1(C): U.S. Addresses Other than Depository Institutions	Other investment liabilities, loans ITA Table 1.2 Line 103
FR 2502q Liabilities 1(C): U.S. Addresses Other than Depository Institutions	Other investment assets, currency and deposits ITA Table 1.2 Line 78

### Proposed Use of FFIEC 030 in BEA's Accounts

Items	Used in Estimation of
FFIEC 030 Schedule RAL "Due From, Due to, and Other" Item 5: Assets that are claims on U.S. addressees other than depository institutions	Other investment liabilities, loans ITA Table 1.2 Line 103
FFIEC 030 Schedule RAL "Due From, Due to, and Other" Item 6: Liabilities to U.S. addressees other than depository institutions	Other investment assets, currency and deposits ITA Table 1.2 Line 78