Basel Committee
on Banking Supervision

Frequently asked questions on Basel III monitoring ad hoc exercise

6 July 2016

BANK FOR INTERNATIONAL SETTLEMENTS

This publication is available on the BIS website (www.bis.org/bcbs/qis/).

Grey underlined text in this publication shows where hyperlinks are available in the electronic version.

ISBN 978-92-9197-602-7 (print)

ISBN 978-92-9197-603-4 (online)

Contents

Frequently asked questions on Basel III monitoring ad hoc exercise

1. Introduction

This document provides answers to technical and interpretive questions raised by supervisors and banks during the Committee's Basel III monitoring ad hoc exercise. **The document intends to facilitate the completion of the monitoring ad hoc exercise and is not to be construed as an official interpretation of other documents published by the Committee.**

Paragraph numbers given in the remainder of this document usually refer to *Basel III: A global regulatory framework for more resilient banks and banking systems* ("the Basel III standards") and the *Basel III leverage ratio framework and disclosure requirements* ("the Basel III leverage ratio framework").[1]

In addition to the guidance for completing the monitoring ad hoc exercise template contained in this document, the Committee has published frequently asked questions as its official response to questions of interpretation relating to certain aspects of the Basel III standards. **Therefore, banks should also take into account the frequently asked questions on capital, counterparty credit risk and the leverage ratio published by the Committee.**[2]

Questions which have been added since the previous version of the FAQs are shaded yellow; questions which have been revised (other than updated cell references) are shaded red.

2. General information

–

3. TLAC

–

[1] Basel Committee on Banking Supervision, *Basel III: A global regulatory framework for more resilient banks and banking systems (revised June 2011)*, June 2011, www.bis.org/publ/bcbs189.htm; Basel Committee on Banking Supervision, *Basel III leverage ratio framework and disclosure requirements*, January 2014, www.bis.org/publ/bcbs270.htm.

[2] Basel Committee on Banking Supervision, *Basel III definition of capital – Frequently asked questions*, December 2011, www.bis.org/publ/bcbs211.htm; Basel Committee on Banking Supervision, *Basel III counterparty credit risk – Frequently asked questions*, December 2012, www.bis.org/publ/bcbs237.htm; Basel Committee on Banking Supervision, *Frequently asked questions on the Basel III leverage ratio framework*, www.bis.org/publ/bcbs293.htm.

4. Leverage ratio

1. Are "bilateral derivatives" in panel H3 intended to include both OTC derivatives and CCP-cleared OTC derivatives?

   Answer: No. The client leg of CCP-cleared derivatives is captured in panel H1 (ETD) and panel H2 (OTC). Panel H3 (bilateral derivatives) captures trades with non-CCP counterparties.

2. The instructions for panel H indicate "in the case of bilateral trades, if the bank has fewer than five counterparties from which IM is received, remaining rows should be completed for top counterparties as determined by their associated Basel III leverage ratio exposure measure as calculated per the current Basel III leverage ratio framework." Does this mean that for the remaining rows banks should fill out only column D and columns I through N?

   Answer: Yes.

3. For reporting panel H, is there a specific approach that should be used to determine net income associated with a particular counterparty?

   Answer: No. Net income for derivatives exposures associated with a particular counterparty should be reported on a best efforts basis.

4. For reporting panel H, if a bank was not operating its client clearing business at full scale during the period for which data is to be reported, should the bank report net income associated with counterparties during the period based on the actual net income for the period or based on estimates for net income assuming the business had been operating at full scale?

   Answer: For purposes of this QIS, the bank should report its estimates for net income associated with each counterparty as if the business had been running at full scale.

5. For reporting panel H, should top counterparties be identified by initial margin received from each counterparty before or after any applicable haircuts?

   Answer: Top counterparties should be identified by initial margin received before any haircuts are applied.

6. For reporting panel H, in the case of counterparties which pledge their deposits of securities, should initial margin received be determined as the sum of all pledged cash and non-cash? If yes, in this case should the identification of top counterparties be determined by initial margin received despite these counterparties not necessarily being those from which the most initial margin is required?

   Answer: In the case cited, initial margin received should be the sum of all pledged cash and non-cash. Top counterparties should continue to be identified and sorted by initial margin received.

7. Given that CVA is calculated on a portfolio level, how should banks attribute amounts of CVA to individual counterparties in column M of panel H?

   Answer: For the purpose of reporting the CVA attributable to a particular counterparty in column M, banks should calculate CVA at the portfolio level (for all relevant counterparties) and allocate CVA to each counterparty on a best efforts basis.

8. What should be reported on panel B row 20 ("Off-balance sheet items with a 100% CCF in the LR CD including Option A for unsettled financial asset purchases") and row 22 ("Off-balance sheet items with a 100% CCF in the LR CD including Option B for unsettled

financial asset purchases"), particularly if a bank does not have any unsettled financial asset purchases to report?

Answer: Banks should report in rows 20 and 22 the notional amount of all off-balance sheet items with a 100% CCF per the consultative document on the Revisions to the Basel III leverage ratio. In row 20, banks should reflect any amounts associated with unsettled financial asset purchases per the treatment specified in Option A in the consultative document. In row 22, banks should reflect any amounts associated with unsettled financial asset purchases per the treatment specified in Option B in the consultative document. If a bank does not have any unsettled financial asset purchases to report in either rows 20 or 22, the values reported in rows 20 and 22 should reflect the notional amounts of any other types of exposures that receive a 100% CCF per the consultative document.

9. If a bank does not report any values for unsettled financial asset purchases on panel F of the Basel III implementation monitoring submission for 31 December 2015, what should be entered on row 21 ("Reported unsettled financial asset purchases as OBS items with a 100% CCF?")?

Answer: A bank should select "No" on row 21 if it does not report any unsettled financial asset purchases on panel F of the Basel III implementation monitoring submission for 31 December 2015.

10. For reporting panel B, what definition of "commitments" should be used for determining off-balance sheet items?

Answer: For the purposes of reporting off-balance sheet items associated with commitments in panel B, banks should use the definition of "commitments" as specified in paragraph 8 of the Annex of the consultative document *Revisions to the Basel III leverage ratio framework*,

11. For reporting values for modified SA-CCR on panels C and E, should the bank include the 1.4 alpha factor in the values reported?

Answer: No. Values of modified SA-CCR on panels C and E should be reported without having applied the 1.4 alpha factor. However, on panel H reporting of SA-CCR-based measures in columns J and K and SA-CCR-based capital requirements in column L should reflect the application of the 1.4 alpha factor.

5. EAD CCF

1. Are the amounts to be reported in rows 18 to 22 EAD CFF panel B mutually exclusive? If so, in what order should they be completed given that for certain facilities more than one row may be applicable?

Answer: Yes, these rows are mutually exclusive. The order in which these rows should be completed is as follows:

- First: "of which: commitment to provide an off balance sheet facility" (row 22)
- Second: "of which: corporate commitment unconditionally cancellable at any time by bank without prior notice" (row 21)
- Third: "of which: with certain drawdown" (row 18)
- Fourth: "of which: original maturity ≤ 1 year" (row 19)
- Fourth: "of which: original maturity > 1 year" (row 20)

Therefore, banks need to work out the total that will show in row 17, and then first extract the subset that are "commitments to provide and off balance sheet facility" and report these in row 22. Second, from what is left, extract the corporate commitments that are unconditionally cancellable at any time by bank without prior notice and report these in row 21. Third, from what is left, extract the facilities with certain draw down and report these in row 18. Finally, split the residual between facilities with a maturity less than one year and more than one year (rows 19 and 20).

2. For the 'EAD CCF' worksheet, which definition of "commitments" should be applied to report the 'Notional' in columns C and J?

Answer: Please report the values for the "Notional" (undrawn amounts) based on the ***new*** definition of commitments as proposed in Section 4.3 of the IRB CD:

"commitment means any contractual arrangement that has been offered by the bank and accepted by the client to extend credit, purchase assets or issue credit substitutes. It includes any such arrangement that can be unconditionally cancelled by the bank at any time without prior notice to the obligor. It also includes any such arrangement that can be cancelled by the bank if the obligor fails to meet conditions set out in the facility documentation, including conditions that must be met by the obligor prior to any initial or subsequent drawdown under the arrangement."

6. CCR

–

7. CRM

–

8. IRB current

1. The bank cannot calculate SA-CCR at this stage. Should it leave Panel B empty?

Answer: No. Banks that cannot apply SA-CCR, should complete Panel B of 'IRB Current' applying only the final standards to equity investments in funds and the standards set out in the document *Capital requirements for bank exposures to central counterparties*.

9. IRB Proposed

1. For calculating the revised RWA for 'large corporate' exposures in the 'IRB Proposed' worksheet, which risk weight do we apply to the entities that belong to the same consolidated group?

Answer: For exposures to large corporates, the treatment as set out in the second consultative document "Revisions to the Standardised Approach for credit risk"[3] applies. Paragraph 100 clearly states that for countries that allow the use of external ratings "*external ratings for one entity within a corporate group cannot be used to risk-weight other entities within the same group*". As such, the risk weight corresponding to the external ratings of the individual entity should be applied. Should an entity not have an external rating, the risk weight applicable to unrated corporates should be applied.

10. IRB Portfolio Migration

–

11. AIRB Input Floors

1. The procedure for allocating amounts in columns E to H at the end of Section 7.5 of the instructions does not work for certain panels where amounts are calculated automatically. How should the panels in this worksheet be completed?

Answer: The procedure for allocating the amounts in columns E to H described at the end of Section 7.5 of the instructions should only be used in panels A, B and C1.

For panels C2 to C11 the following procedure should be used. For the RWA column (column G) in panel CX (where X is the panel being competed), for each exposure:

a) Calculate the RWA for the full exposure ($RWA_{panel\ CX}$) under the PD and LGD floors set out in panel CX.

b) Calculate the RWA of the full exposure using the baseline floors set out in panel C1 ($RWA_{baseline}$).

c) For the rows that relate to the parts of the exposure where the PD and LGD floors do not change relative to the baseline, the amount reported in those row must be the same amount reported in panel C1 for that exposure.

d) For the rows that relate to parts of the exposure where the PD and LGD floors do change relative to the baseline, the total amount to be reported in those rows is: $RWA_{panel\ CX}$ minus the amounts reported in (c) above. Note that amounts for rows of exposure in which PD or LGD floors change are **not** subtracted.

e) In cases where the floors on multiple parts of the exposure change relative to the baseline, the total amount calculated in (d) should be allocated across the rows relating to the parts of the exposure where the floors change. This allocation should

[3] See www.bis.org/bcbs/publ/d347.htm.

be based on the relative sizes of these parts of the exposure (after the applicable haircuts).

The same procedure as described above for RWA (column G) should be followed for reporting the EL amounts (column H) and EAD bound by the floors (column F).

As an example of the above methodology, consider an exposure of €100 that has RWA of €9 under the baseline proposal, consisting of €50 secured by CRE (post haircut), €30 secured by eligible financial collateral (post haircut) and the remaining €20 is unsecured. Under Panel C1 the risk weighted assets will be reported as €4.5 in (=€9 · €50/€100) in the "Exposures secured by CRE/RRE" row, €2.7 in (=€9 · €30/€100) in the "Exposures secured by financial collateral" row, and €1.8 in (=€9 · €20/€100) in the "Unsecured portion of secured exposure" row.

Assume that the exposure is now being reported in panel C4, and the RWA of the exposure are now €10 due to the higher floor relating to certain parts of the exposure. It can be seen that the floors on the part of the exposure secured by financial collateral do not change relative to the baseline. Therefore, the amount that is reported in panel C4 according to point (c) in the methodology above is the same as the amount reported in panel C1 (ie €2.7 is to be reported in the financial collateral row, which will feed into this automatically). According to point (e) above, the remaining RWA of €7.3 (=€10 – €2.7), must be allocated to the rows "Exposures secured by CRE/RRE" and "Unsecured portion of secured exposure" based on the relative sizes of these parts of the exposure (after the applicable haircuts). Therefore, €5.2 (=€7.3 · €50/(€50+€20)) is to be reported in the "Exposures secured by CRE/RRE" row and €2.1 (=€7.3 · €20/(€50+€20)) is to be reported in the "Exposures secured by financial collateral" row.

2. For the "AIRB Input Floors" worksheet, what is to be exactly included in the corporate exposures?

Answer: When referring to corporate exposures in the "AIRB input floors" worksheet all corporate exposures should be included, ie including general corporates, specialised lending exposures not treated under the supervisory slotting criteria approach, SMEs treated as corporates, financial institutions treated as corporates and corporate eligible purchased receivables.

12. AIRB LGD Downturn

–

13. FIRB Parameters

1. For the 'FIRB Parameters' worksheet, what is to be exactly included in the corporate exposures?

Answer: The corporate exposures refer to the sum of: (i) large and mid-market general corporates, (ii) SME treated as corporates, and (iii) corporate exposures in the purchased receivables only. Please do not include specialised lending or financial institutions treated as corporate exposures.

14. Other IRB Changes

–

15. IRB Questions

General questions	
Q-1	Was the exercise completed considering all the bank's assets? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: no, immaterial asset classes were assumed to be zero; please explain! • 3: no, some asset classes include only partial data (eg excluding exposures from a certain subsidiary); please explain! • 4: no, all asset classes include only partial data (eg excluding exposures from a certain subsidiary); please explain! • 5: no, the bank only considered the asset classes most important for its business model; please explain!
IRB Current	
Q-2	Has your bank been able to complete panel B in the 'IRB Current' worksheet applying the revised standards for SA-CCR? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: no
Q-3	Has your bank been able to complete panel B in the 'IRB Current' worksheet applying the revised standards for equity investments in funds? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2:yes, but by applying the fallback approach (FBA) • 3: no
Q-4	Has your bank been able to complete panel B in the 'IRB Current' worksheet applying the revised standards on capital requirements for banks' exposures to CCPs? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: no

IRB Proposed	
Q-5	Has your bank been able to complete the 'IRB Proposed' worksheet applying the revised standards for SA-CCR? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: no
Q-6	Has your bank been able to complete the 'IRB Proposed' worksheet applying the revised standards for equity investments in funds? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: yes, but only by (largely) applying the fallback approach (FBA) • 3: no
Q-7	Has your bank been able to complete the 'IRB Proposed' worksheet applying the revised standards on capital requirements for banks' exposures to CCPs? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: no
Q-8	Has your bank been able to complete all panels in the 'IRB Proposed' worksheet applying the changes to the CCFs as set out in section 4.3 of the IRB consultative document for exposures under the FIRB approach? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: yes, but only partially; please explain! • 3: no
Q-9	Has your bank been able to complete all panels in the 'IRB Proposed' worksheet applying all the changes to the input floors for exposures under the FIRB approach? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: no
Q-10	Has your bank been able to complete all panels in the 'IRB Proposed' worksheet applying the changes to the CCFs as set out in section 4.3 of the IRB consultative document for exposures under the AIRB approach? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: yes, but only partially; please explain! • 3: no
Q-11	Has your bank been able to complete all panels in the 'IRB Proposed' worksheet applying all the changes to the input floors for exposures under the AIRB approach? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: yes, but only for corporates exposures • 3: yes, but only for retail exposures • 4: no

Q-12	Has your bank been able to complete all panels in the 'IRB Proposed' worksheet applying all the migrations to the revised standardised approach as set out in sections 2.2 and 2.3 of the IRB consultative document? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: yes, but with migration to current SA rather than revised SA • 3: no
Q-13	Has your bank been able to complete all panels in the 'IRB Proposed' worksheet applying all the migrations to the FIRB approach as set out in sections 2.2 of the IRB consultative document? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes, by applying the implicit maturity adjustment • 2: yes, by applying the explicit maturity adjustment • 3: yes, but with migration to current FIRB rather than revised FIRB and by applying the implicit maturity adjustment • 4: yes, but with migration to current FIRB rather than revised FIRB and by applying the explicit maturity adjustment • 5: other; please explain! • 6: no
Q-14	Has your bank been able to complete all panels in the 'IRB Proposed' worksheet applying all the migrations to the supervisory slotting criteria approach as set out in sections 2.2 of the IRB consultative document? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: no, we applied the revised standardised approach instead • 3: no, we applied the current standardised approach instead
Q-15	Has your bank been able to complete all panels in the 'IRB Proposed' worksheet applying all the other IRB changes related to credit risk mitigation as set out in section 4.5 of the IRB consultative document? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: yes, but only partially; please explain! • 3: no
Q-16	Has your bank been able to complete columns T and U in the 'IRB Proposed' worksheet applying all revisions to the standardised approach and removing modelling for CCR? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: no, the current standardised approach was reported • 3: no, modelled CCR exposures were still reported • 4: no, both the current standardised approach and modelled CCR exposures were reported • 5: other; please explain!
Q-17	Has your bank been able to complete columns V and U in the 'IRB Proposed' worksheet migrating all non-retail exposures currently under AIRB to the revised FIRB approach? Answer options • 0: not applicable/our bank cannot respond to this question • 1: yes • 2: yes, but using the current FIRB approach • 3: no

AIRB Input Floors	
Q-18	Which asset classes did the bank include in the corporate section? • 0: not applicable/our bank cannot respond to this question • 1: only large and mid-market general corporates • 2: large and mid-market general corporates and SME treated as corporates • 3: large and mid-market general corporates and eligible purchased corporate receivables • 4: large and mid-market general corporates and specialised lending • 5: large and mid-market general corporates, SME treated as corporates and eligible purchased corporate receivables • 6: large and mid-market general corporates, SME treated as corporates and specialised lending • 7: large and mid-market general corporates, eligible corporate purchased receivables and specialised lending • 8: large and mid-market general corporates, SME treated as corporates, eligible purchased corporate receivables and specialised lending • 9: other; please explain!
FIRB Parameters	
Q-19	Which asset classes did the bank include in the corporate section? • 0: not applicable/our bank cannot respond to this question • 1: only large and mid-market general corporates • 2: large and mid-market general corporates and SME treated as corporates • 3: large and mid-market general corporates and eligible purchased corporate receivable • 4: large and mid-market general corporates and specialised lending • 5: large and mid-market general corporates, SME treated as corporates and eligible purchased corporate receivables • 6: large and mid-market general corporates, SME treated as corporates and specialised lending • 7: large and mid-market general corporates, eligible purchased corporate receivables and specialised lending • 8: large and mid-market general corporates, SME treated as corporates, eligible purchased corporate receivables and specialised lending • 9: other; please explain!
EAD CCF	
Q-20	For 'direct credit substitutes' in the' EAD CCF' worksheet, which CCF did you use to calculate the EAD? • 0: not applicable/our bank cannot respond to this question • 1: own estimate • 2: supervisory value (ie as set out in the consultative document for the revised standardised approach)
Q-21	For 'repos' in the' EAD CCF' worksheet, which CCF did you use to calculate the EAD? • 0: not applicable/our bank cannot respond to this question • 1: own estimate • 2: supervisory value (ie as set out in the consultative document for the standardised approach)
Q-22	For 'lending of securities' in the' EAD CCF' worksheet, which CCF did you use to calculate the EAD? • 0: not applicable/our bank cannot respond to this question • 1: own estimate • 2: supervisory value (ie as set out in the consultative document for the revised standardised approach)
Q-23	For 'Off-balance sheet items not explicitly included in any other category' in the' EAD CCF' worksheet, which CCF did you use to calculate the EAD? • 0: not applicable/our bank cannot respond to this question • 1: own estimate • 2: supervisory value (ie as set out in the consultative document for the revised standardised approach)

Q-24	For 'commitments' in the' EAD CCF' worksheet, which CCF did you use to calculate the EAD? • 0: not applicable/our bank cannot respond to this question • 1: own estimate • 2: supervisory value (ie as set out in the consultative document for the revised standardised approach)
Q-25	For 'NIFs and RUFs' in the' EAD CCF' worksheet, which CCF did you use to calculate the EAD? • 0: not applicable/our bank cannot respond to this question • 1: own estimate • 2: supervisory value (ie as set out in the consultative document for the revised standardised approach)
Q-26	For 'certain transaction-related contingent items' in the' EAD CCF' worksheet, which CCF did you use to calculate the EAD? • 0: not applicable/our bank cannot respond to this question • 1: own estimate • 2: supervisory value (ie as set out in the consultative document for the revised standardised approach)
Q-27	For 'short-term self-liquidating trade letters of credit' in the' EAD CCF' worksheet, which CCF did you use to calculate the EAD? • 0: not applicable/our bank cannot respond to this question • 1: own estimate • 2: supervisory value (i.e. as set out in the consultative document for the standardised approach)
Q-28	For 'retail commitments that are unconditionally cancellable' in the' EAD CCF' worksheet, which CCF did you use to calculate the EAD? • 0: not applicable/our bank cannot respond to this question • 1: own estimate • 2: supervisory value (ie as set out in the consultative document for the revised standardised approach)
Q-29	For 'off-balance sheet unsettled securities, commodities and foreign exchange transactions' in the' EAD CCF' worksheet, which CCF did you use to calculate the EAD? • 0: not applicable/our bank cannot respond to this question • 1: own estimate • 2: supervisory value (ie as set out in the consultative document for the revised standardised approach)
Q-30	For 'credit protection provided through first-to-default and second-to-default credit derivatives' in the' EAD CCF' worksheet, which CCF did you use to calculate the EAD? • 0: not applicable/our bank cannot respond to this question • 1: own estimate • 2: supervisory value (ie as set out in the consultative document for the revised standardised approach)

16. TB

1. The multiplication factor m_c is not included in the calculation of IMCC in paragraph 189 of the revised market risk standard, *Minimum capital requirements for market risk*. Should the value reported in cell C31 be equal to $IMCC \times m_c$?

   Answer: Yes. The value reported in cell C31 should be the product of $IMCC \times m_c$, with $m_c = 1.5$.

2. In calculating IMCC (across all asset classes, with full diversification) in cell C31, what value should be assigned to the parameter ρ?

   Answer: The value of ρ should be set at 0.5 as per paragraph 189 of the revised market risk standard.

3. Are banks to reflect diversification effects to report "SBM (delta, vega, and curvature) – both non-securitisations and securitisations – (inclusive of diversification effect from GIRR)" in cells C18 and C39 of the 'TB' worksheet?

Answer: Yes. Banks should include all diversification effects in cells C18 and C39, reflecting the standardised capital requirement for both non-securitisation and securitisation portfolios after taking any diversification into account. Diversification effects may include those recognised in the market risk standard that are associated with general interest rate risk (GIRR), credit spread risk (CSR) and foreign exchange (FX) risk. For example, banks may include non-securitisation CSR hedges for securitisation positions if they are recognised in the revised market risk standard.

4. Paragraph 161 of the revised market risk standard states that "The SA capital charge for an individual cash securitisation position can be capped at the fair value of the transaction." However, instructions for the 'TB' worksheet do not address this issue. Panels B1 and B2 have cells for SBA, Residual Risk Add-On and DRC for securitisations, but the instructions do not specify how to report any capped capital charge these positions. In which cell(s) should this capped capital charge be reported?

Answer: Capital for securitisation (non-CTP) positions which trigger the max loss provision should be prorated under the relevant components of the SA capital charge, limiting the total capital contribution of these positions to their fair value. Specifically, individual components of the SA capital charge should equal the component's share of actual capital multiplied by the fair value of the position. Any deviations from the proposed treatment should be explicitly noted in an explanatory document accompanying the submission.

5. If a bank reports a value for Total SBA on the "TB FRTB SA" worksheet, the data check on row 11 of the "TB" worksheet compares the value reported for FRTB standardised approach as applied only to those trading desks for which the bank expects to utilise the standardised approach against the value of the FRTB standardised approach as applied to all of the bank's trading desks. Please advise what action a bank should take if it fails this data check.

Answer: Please disregard the data check on row 11 of the "TB" worksheet.

6. If a bank reports IMA capital requirements for modelled desks in panel B2 (rows 30 through 33), for which desks should it report SBA capital requirements in panel B2?

Answer: Banks that report IMA capital requirements for modelled desks in panel B2 should report SBA capital requirements for those same desks (ie modelled desks) in rows 34 through 37, and should report SBA capital requirements for the remaining desks that the bank does not model (ie non-modelled desks) in rows 38 and 39.

17. TB SA current

–

18. TB SA FRTB

–