



March 21, 2003

TO: The Individual Responsible for Preparing FFIEC 009 and 009a Country Exposure Reports

On March 3, 2003, the FFIEC published in the Federal Register notice that, effective with the March 31, 2003, report date, respondents would be required to file the Country Exposure Report (FFIEC 009) and the Country Exposure Information Report (FFIEC 009a) using the Internet. Respondents would no longer be offered the option of filing a hard-copy paper report. The Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation have arranged to have the Federal Reserve Bank of New York collect and process the FFIEC 009 and 009a reports on their behalf via the Federal Reserve System's Internet Electronic Submission (IESUB) system. The submission deadline remains 45 calendar days after the report date. The U.S. Office of Management and Budget (OMB) must approve these changes before they become final. The FFIEC anticipates final approval by April 3, 2003.

The IESUB system offers a variety of benefits including the ability to enter data directly onto the electronic form, submit a formatted spreadsheet that can be converted into a text file, and submit via file transfer. Other options include the ability to submit both initial and revised data, a "remarks" section to provide explanations for large variances, and 128-bit encryption. The IESUB option is already available for many Federal Reserve System report series and is currently being utilized by over 1,000 respondents.

In anticipation of OMB approval, the FFIEC is providing you information to assist you in planning for these changes. In order to submit the FFIEC 009 and 009a to the Federal Reserve Bank of New York using IESUB, you must agree to the terms as stated in the attached Federal Reserve System Operating Circular No. 5, "Electronic Access." You must also have a personal computer (PC) and operating system capable of running recent versions of Netscape Communicator or Microsoft Internet Explorer browser software with 128-bit SSL encryption. Finally, respondents must complete the attached User Request Form, if possible by March 31, 2003, and forward it to:

International and Market Reports Division
Federal Reserve Bank of New York, 4th Floor
33 Liberty Street
New York, NY 10045

The User Request Form must be signed by an authorized signatory at your institution. Upon receipt of this form, the Federal Reserve Bank of New York will send you a user ID and password for each authorized staff member, the IESUB web site address, and the effective date of the authorization.

All questions regarding this change should be addressed to Patricia Selvaggi, Staff Director, International and Market Reports Division, at (212) 720-8037 or at Patricia.Selvaggi@ny.frb.org. Respondents should refer to the Federal Reserve System reporting Web site's IESUB information page at <http://www.reportingandreserves.org/iesub.html> for User Guides, User Request Forms, and other important information.

A handwritten signature in black ink, appearing to read "Joanne M. Giese". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

Joanne M. Giese
Acting Executive Secretary

Attachments

Country Exposure Information Report as of _____

Reporting Institution

City

State

Name, title, and phone number of bank officer to whom inquiries regarding this report may be directed:

Name

Title

Area Code/Phone Number

A copy of this report will be released to the public upon request.

This report is required to be filed by national banks, state member banks and bank holding companies, and insured state nonmember commercial banks pursuant to authority contained in Section 907 of 12 U.S.C. 3906.

All FFIEC 009a respondents should submit their completed report, via the Federal Reserve System's Internet Electronic Submission (IESUB) system, within 45 days of the reporting date. Any FFIEC 009a respondent who needs guidance is encouraged to visit the Federal Reserve System Web site <http://www.reportingandreserves.org/req.html> for additional information on IESUB.

Public reporting burden for this collection of information is estimated to average 5.25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. A Federal agency may not conduct or sponsor, and an organization (or a person) is not required to respond to a collection of information, unless it displays a currently valid OMB control number. Comments concerning the accuracy of this burden estimate and suggestions for reducing this burden should be directed to the Office of Information and Regulatory Affairs, Office of Management and Budget, Paperwork Reduction Project (7100-0035), Washington, D.C. 20503, and to one of the following:

Secretary
Board of Governors of the Federal Reserve System
Washington, D.C. 20551

Legislative and Regulatory Analysis Division
Office of the Comptroller of the Currency
Washington, D.C. 20219

Assistant Executive Secretary
Federal Deposit Insurance Corporation
Washington, D.C. 20429

Country Exposure Information Report

FFIEC 009a

General Instructions

This report is a supplement to the Country Exposure Report (Form FFIEC 009) filed with the banking regulatory agencies for bank examination purposes. The purpose of the Country Exposure Information Report is to provide public disclosure of significant country exposures of U.S. banking institutions. A photocopy of this report will be made available to the public by regulatory agencies upon request.

Who Must Report

This report must be filed by every institution that submits Form FFIEC 009 and that has exposure meeting the reporting requirements for Form FFIEC 009a as defined in these instructions.

This supplemental disclosure report (Form FFIEC 009a) has two parts: Part A and Part B. Part A will be completed when exposure, as defined for Column 4, Part A, to a single country exceeds one percent of the banking institution's total assets or exceeds 20% of the banking institution's total capital, whichever is less. Part B will be used to report the names of the countries where the amount of exposure exceeds 0.75 percent but does not exceed 1 percent of the banking institution's total assets or is between 15 percent and 20 percent of the banking institution's total capital, whichever is less. The banking institution must only list the names of the countries and the aggregate amount of exposure for all countries listed under Part B. For the purposes of meeting this criteria, exposure is defined as the amount of total claims computed in accordance with the instructions to Column 4, Part A.

Total assets of reporting banks are those submitted on the Report of Condition to the federal bank supervisors as of the same date. For bank holding companies total assets are those submitted on the most recent Form FR Y-9.

Total capital is as defined in the agencies' guidelines on capital adequacy and consists of Tier 1 plus Tier 2 capital.

Filing of Reports

The report is to be prepared quarterly, as of the end of March, June, September and December. All respondents should submit their completed report via the Federal Reserve System's Internet Electronic Submission (IESUB) system, within 45 days of the reporting date.

The Federal Reserve district banks will provide technical assistance to any respondent who needs guidance creating files for their 009a submission via IESUB. Any FFIEC 009a respondent who needs guidance is encouraged to visit the Federal Reserve System Web site <http://www.reportingandreserves.org/req.html> for additional information on IESUB. The Web site also includes a link that respondents may use to contact their local Federal Reserve district bank.

Rounding

Round all amounts reported on this form to the nearest million dollars.

Part A

Country

The countries listed in Part A should be those where exposure, as defined for Column 4, Part A, exceeds 1 percent of total assets or 20 percent of total capital, whichever is less. The names of the countries reported should be as they appear on Form FFIEC 009.

FFIEC 009a

Column 1: Amount of Cross-border Claims Outstanding After Mandated Adjustments for Transfer of Exposure (excluding derivative products)

For each country line reportable on the FFIEC 009a report, report in Column 1 the sum of the following columns from Schedule 1 of the FFIEC 009 report:

Column 4, Schedule 1
Less Column 8, Schedule 1
Less Column 9, Schedule 1
Less Column 10, Schedule 1
Plus Column 11, Schedule 1
Plus Column 12, Schedule 1
Plus Column 13, Schedule 1

Column 2: Amount of Net Local Country Claims (including derivative products)

List the total amount of *net* local country claims on local residents: From the FFIEC 009 report, Local Country Claims (Column 18 of Schedule 1 and Column 6 of Schedule 2) *less* Local Country Liabilities (Column 19 of Schedule 1 and Column 7 of Schedule 2), *if* the difference is positive (do not include if the difference is negative).

Column 3: Amount of Cross-Border Claims Outstanding from Derivative Products after Mandated Adjustments for Transfer of Exposure

List the total amount of cross-border claims from derivative products: From the FFIEC 009 report, Column 4, Schedule 2.

Column 4: Adjusted Cross-Border and Foreign Office Local Country Claims

Total of Column 1 *plus* Column 2 plus Column 3.

Columns 5 to 9: Distribution of Cross-Border Claims Outstanding (excluding derivative products)

Columns 5, 6, and 7: Distribute the amounts in Column 1 by type of borrower: Banks (Column 5), Public Sector Entities (Column 6), and Other (Column 7). The definition of these groups are as given in the instructions to Form FFIEC 009. The sum of Columns 5, 6, and 7 must equal Column 1.

Columns 8 and 9: Distribute the amounts in Column 1 according to time remaining to maturity as defined in Form FFIEC 009. One Year and Under (Column 8) and Over One Year (Column 9).

In completing Columns 8 and 9, estimates may be used.

Part B

Provide the name of each country not listed in Part A where the institution has exposure, as defined for Column 4 of Part A, that exceeds 0.75 percent but does not exceed 1 percent of the reporting institution's assets or is between 15 percent and 20 percent of its total capital, whichever is less. In the box provided, give the total amount of exposure to all of the countries listed in Part B.

Optional Management Statement Concerning the Country Risk Information Reported On FFIEC 009a

The management of the reporting institution may, if it wishes, submit a brief statement concerning the data submitted on this report. This statement may be used by management to explain any differences between the information contained in this report and information filed with the Securities and Exchange Commission pursuant to U.S. securities laws, or to provide any other information concerning the data that management believes would further public understanding of the reporting institutions country exposure.

All information in the narrative statement must be accurate and not misleading. Appropriate efforts shall be taken by the filing institution to ensure the statement's accuracy.

As this optional statement will be made available to the public as submitted, institutions choosing to submit it should ensure that the statement does not contain information that they are not willing to have made public or that would compromise the privacy of their customers.

The optional statement should be entered in the remarks section of the IESUB application. Copies of the report will be provided to the public upon request.