June 24, 2003

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

The reporting forms and instructions for the quarterly Country Exposure Report (FFIEC 009) and the Country Exposure Information Report (FFIEC 009a) for the June 30, 2003, report date are now available on the FFIEC’s Web site at http://www.ffiec.gov/ffiec_report_forms.htm. A number of updates have been made to the FFIEC 009/009a country names and codes. The country code updates have been made to achieve consistency with the U.S. Department of State’s official country list. In addition, FFIEC 009 instructional guidance has been provided to remind respondents of the process for reporting the reallocation of claims. All of the updates are described in detail below.

Country Code Updates

Europe:
- **Added** - “European Central Bank” (13501) - Claims on the European Central Bank were previously included in “Other Europe” (18007)
- **Added** - “Serbia & Montenegro, formerly Yugoslavia” (13218) - Claims on Serbia & Montenegro were previously included in “Other Europe” (18007)
- **Added** - “Channel Islands & Isle of Man” (13056) - Claims on the Channel Islands & Isle of Man were previously included in “United Kingdom” (13005)

Africa:
- **Renamed and Moved** - The country of “Zaire” (51705) has been renamed as “Congo (Kinshasa), former Zaire” and moved after “Congo (Brazzaville)” (51608) (*Please note this change will alter the placement of codes on the file transfer spreadsheet for IESUB submission.*)

Other Countries:
- **Renamed and Moved** - The country of “U.S. Territories & Pacific Islands” (62502) has been renamed as “Palau, former U.S. Territories & Pacific Islands” and moved after “New Zealand” (61689) (*Please note this change will alter the placement of codes on the file transfer spreadsheet for IESUB submission.*)
FFIEC 009 Instructional Guidance

Reallocations of Claims - Columns 8 through 10 and 11 through 13 reflect the extent to which the ultimate source of repayment may be in a country other than the country of the direct borrower as reported in columns 1 through 4. Report in columns 8 through 10 the amount of the direct claim (reported in column 4) that is guaranteed by a bank or other guarantor in another country (including the United States) according to the sector of the obligor. For the United States line, report in columns 8 through 10 claims on U.S. branches of foreign banks and foreign-owned U.S. banking organizations where the claim carries the formal guarantee of a foreign resident, even though the claim is not reported in column 4. In columns 11 through 13 all entries in columns 8 through 10 are reallocated according to the country and sector of the guarantor.

The submission deadline for the FFIEC 009/009a reports is Thursday, August 14, 2003. Effective with the March 31, 2003, report date, respondents are required to file the FFIEC 009 and FFIEC 009a with the Federal Reserve Bank of New York via the Federal Reserve System’s Internet Electronic Submission (IESUB) system. The updates for June 30, 2003, have been incorporated into the IESUB User Guides, available at: http://www.reportingandreserves.org/iesub.html. Under the Regulatory Reports Monitoring Program, the timeliness of the receipt of these reports will be monitored. The accuracy of the report submitted is monitored through the use of validity edits. The current edits for the FFIEC 009/009a reports remain unchanged.

If you have any questions with regard to filing the June 30, 2003, FFIEC 009/009a reports, please contact Patricia Selvaggi, Staff Director, International Reports Division, Federal Reserve Bank of New York by telephone at (212-720-8037) or by email at: Patricia.Selvaggi@ny.frb.org.

[Signature]

Tamara Wiseman
Executive Secretary
Country Exposure Information Report
as of ____________________

<table>
<thead>
<tr>
<th>Reporting Institution</th>
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<tbody>
<tr>
<td>City</td>
<td>State</td>
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</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Area Code/Phone Number</th>
</tr>
</thead>
</table>

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
PART A — Information on exposure (as defined for Column 4) to any country that exceeds 1 percent of the reporting institution’s total assets or 20 percent of its total capital, whichever is less.

<table>
<thead>
<tr>
<th>Country</th>
<th>Amount of Cross-border Claims Outstanding After Mandated Adjustments for Transfer of Exposure (excluding derivative products)</th>
<th>Amount of Net Local Country Claims (including derivative products) after Mandated Adjustments for Transfer of Exposure</th>
<th>Total of Columns (1) Plus (2) Plus (3)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(1)</td>
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<td>(8)</td>
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</tbody>
</table>

PART B — Information on exposures (as defined in Part A, Column 4) to any country not listed in Part A, where exposure 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.

Names of countries where exposures meet the reporting criteria stated for Part B

Total amount of exposure to all of the countries listed in Part B $__

Statement by management of the reporting institution concerning the information reported above. (OPTIONAL)
INSTRUCTIONS FOR THE PREPARATION OF THE

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.reporting and reserves.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.