



January 9, 2012

To the Chief Executive Officer of the Bank Holding Company:

It is time to file the FR Y-6, Annual Report of Bank Holding Companies, for fiscal year end **December 31, 2011**. The FR Y-6 reporting form and instructions are available on the Federal Reserve Board's web site at www.federalreserve.gov under "Reporting Forms." The FR Y-6 reporting form and instructions were revised beginning with fiscal year end of December 31, 2011. See Attachment 1 for a summary of the revisions.

As stated on the cover page of the FR Y-6 report form, the FR Y-6 Report is required by law: Section 5(c)(1)(A) of the Bank Holding Company Act (12 U.S.C. § 1844(c)(1)(A)); Section 8(a) of the International Banking Act (12 U.S.C. § 3106(a)); Sections 11(a)(1), 25 and 25A of the Federal Reserve Act (12 U.S.C. §§ 248(a)(1), 602, and 611a); Section 211.13(c) of Regulation K (12 CFR 211.13(c)); and Section 225.5(b) of Regulation Y (12 CFR 225.5(b)).

The following are enclosed with this letter:

- ❖ **Attachment 1** summarizing revisions to the report form and instructions
- ❖ **Attachment 2** with examples of personally identifiable information to exclude
- ❖ **Organization chart** for the top-tier bank holding company
- ❖ **Checklist** to assist you in completing the FR Y-6

Important:

- ❖ Please provide a response for each report item. Respond with "none" or "n/a" if applicable.
- ❖ The FR Y-6 is a public document. Thus, it should exclude personal information that may compromise the personal privacy interests of shareholders and insiders.

Please mail the completed FR Y-6 to the address below at least 3 days prior to the March 30, 2012 deadline. Be sure to retain a signed copy of the completed report for your files. Reports received late but postmarked 3 days prior to the deadline date will be considered timely.

Federal Reserve Bank of Minneapolis
Division of Supervision, Regulation, & Credit
ATTN: National Information Center
P.O. Box 291
Minneapolis, MN 55480-0291

If you desire a paper copy of the FR Y-6 or have questions, please contact a Statistical & Structure Reports analyst at (612) 204-6445, (888) 887-0926, or mpls.statistics@mpls.frb.org.

Sincerely,

Rebecca S. Helfenstein
Manager
Supervision, Regulation, & Credit

ATTACHMENT 1

Revisions to the FR Y-6 effective beginning with fiscal year-end of December 31, 2011

Report Forms

- (1) Cover page. Revised the expiration date to December 31, 2014.

Report Instructions

- (1) *General Instructions-Confidentiality*. Clarified the language regarding confidentiality of the reporter's submission. Also, clarified the instructions to state that the second page of the report form should not be submitted by organizations that do not have subsidiary holding companies.
- (2) *Organizational Chart*. Revised the organizational chart instructions to include information on physical address and general and limited partners. Added the rounding definition from the FR Y-10 to ensure the reporting of percentage ownership is consistent across all structure reporting forms. Updated the FASB Accounting Standards Codification reference for Variable Interest Entity.
- (3) *Securities Holders*. Modified the language for securities holders to include persons working in concert, including families. Added the U.S. Treasury website for the TARP CPP program.
- (4) *Insiders*. Revised the insiders information to include options, warrants, or other securities as reportable voting securities and to include families in the definition of a principal securities holder.

ATTACHMENT 2

Examples of Personally Identifiable Information (PII)

Information deemed to be personal and sensitive information by the Federal Reserve Board is not requested on the FR Y-6. Below are common types of personal information that should be excluded. Revisions will be requested for any FR Y-6 that includes this personal information.

- ❖ social security number
- ❖ personal street address(es) and phone number(s)
- ❖ driver's license number
- ❖ birth date
- ❖ place of birth
- ❖ account numbers
- ❖ passwords
- ❖ security codes (including biometric records)
- ❖ other personal information that is linked to or can be linked to an individual, such as mother's maiden name
- ❖ information on an individual's financial transactions, medical history, and criminal history, and information about an individual's education or employment history
- ❖ details on an individual's securities holdings (whether the securities are held through specific IRA or trust accounts located at particular institutions; whether the securities are held on behalf of specifically identified family members, including minor children)
- ❖ any other information regarding the individual that is *not* specifically required to be provided under the relevant report instructions

