

3501 Fairfax Drive, Room 3086 - Arlington, VA 22226 - (703) 516-5588 - FAX (703) 516-5478

December 20, 2004

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

Forms and instructions for the quarterly Country Exposure Report (FFIEC 009) and its Supplemental Country Exposure Information Report (FFIEC 009a) to be used for the December 31, 2004, report date can be found at http://www.ffiec.gov/ffiec_report_forms.htm. There are no changes to the report forms or instructions this quarter.

As you know, proposed changes to the FFIEC 009 were published in the Federal Register on August 17, 2004 for public comment. The FFIEC has reviewed the comments and has decided to postpone the implementation of changes to the FFIEC 009 until September 30, 2005. A Federal Register Notice will be published in the first quarter of 2005 announcing the planned changes.

Under the Regulatory Reports Monitoring Program, the timeliness of receipt of these reports will be monitored. Completed FFIEC 009 and 009a reports must be electronically submitted no later than Monday, February 14, 2005. Any reports received after February 14 will be considered late. In addition, the accuracy of the submitted reports will be monitored through the use of validity edits. The current edits for the FFIEC 009 reports are unchanged and a copy is attached.

The User Guides and file format for IESUB submission via file transfer can be found at http://www.reportingandreserves.org/iesub.html. Users should note the new "Save" feature available for use on the IESUB application. This new enhancement allows data entry users to save data and print a copy of the report for review prior to submission to the Federal Reserve Bank of New York.

Individual FFIEC 009 reports will be regarded as confidential. Neither the individual reports nor any aggregate data that may indicate the activities of individual institutions will be publicly disclosed. However, the FFIEC 009a is published and made available on the FFIEC's public web site at http://www.ffiec.gov/E16.htm.

All questions concerning the FFIEC 009 and FFIEC 009a reports should be addressed to Richard Molloy, Staff Director, Regulatory Reports Division, Federal Reserve Bank of New York, at

(212) 720-6393 or at Rich.Molloy@ny.frb.org or Alex Santana, Team Leader of the Division, at

(212) 720-6357 or at Alex.Santana@ny.frb.org.

Tamara Wiseman

Executive Secretary

Attachment