

Appendix: Resolution Submission Content

Note: This Appendix compares the requirements of the current rule and the Proposal with respect to information content of resolution submissions. It does not cover resolution planning guidance. **Highlighted** items apply only to group A CIDs.

Current Rule Item	Proposed Rule Item and Differences
Executive Summary	<p>Executive Summary</p> <ul style="list-style-type: none"> • Largely similar to current rule
Organizational Structure: Legal Entities; Core Business Lines and Branches	<p>Organizational structure: legal entities; core business lines; and branches</p> <ul style="list-style-type: none"> • Requires identification of regulated subsidiaries • Introduces "franchise component" concept • Requires discussion of core business line value dependencies on parent company or its affiliates
	<p>Overall deposit activities</p> <ul style="list-style-type: none"> • Requires information on relationship of deposit segments to core business lines and franchise components • Requires discussion of foreign deposits, and identification of deposits dually payable in United States • Requires information on deposit sweep arrangements; omnibus, sweep and pass-through accounts; and reporting capabilities on the foregoing • Requires identification of key depositors
	<p>Key personnel</p> <ul style="list-style-type: none"> • Defined as personnel with essential role in support of core business lines, franchise components or critical service, or having function, responsibility, or knowledge that is important to resolution, regardless of whether such person is employed by CIDI, affiliate or third party
Critical Services	<p>Critical Services</p> <ul style="list-style-type: none"> • Requires demonstration of capabilities necessary to ensure continuity of critical services while in resolution • Introduces "critical services support" concept, defined as the resources necessary to support the provision of critical services (e.g., systems, technology infrastructure, key personnel, facilities, etc.) • Requires information on process for collecting and monitoring contracts governing critical services and critical services support
Strategy to Separate from Parent Company's Organization	<p>Separation from parent; potential barriers or material obstacles to orderly resolution</p> <ul style="list-style-type: none"> • Adds new focus on impact of separation to BDI value
No corresponding item	<p>Failure scenario</p> <ul style="list-style-type: none"> • Requires CIDs to consider failure under severely adverse economic conditions only • Requires assumption that CIDI has experienced material financial distress such that its failure is result

	<p>of depletion of capital and/or liquidity, and parent is in bankruptcy</p> <ul style="list-style-type: none"> • Must consider depletion of capital even if immediate failure is liquidity-related • Requires support for any assumptions of discount window access or other borrowings prior to failure • May only assume Deposit Insurance Fund support for BDI if CIDI can demonstrate borrowing capacity on fully secured basis and repayment source • Permits FDIC to provide "additional or alternative parameters" for failure scenario, which may apply to all group A CIDs or just specific CIDs
Strategy for the Sale or Disposition of Deposit Franchise, Business Lines and Assets	<p>Identified strategy</p> <ul style="list-style-type: none"> • Sets BDI as default strategy for group A CIDs • Prohibits strategies based on sale or disposition to one or more acquirers over resolution weekend <p>Franchise components</p> <ul style="list-style-type: none"> • Defined as business segment, regional branch network, major asset or asset pool, or other key component of the IDI franchise that currently can be separated and marketed in a timely manner • Requires considerable information about franchise components, including key assumptions underpinning their divestiture, marketing capabilities, prospective bidders, virtual data room capabilities and content, etc.
Least Costly Resolution Method	<p>Valuation to facilitate FDIC's assessment of least-costly resolution method</p>
Asset Valuation and Sales	<ul style="list-style-type: none"> • Requires group A CIDs to demonstrate capabilities necessary to produce valuations that the FDIC can use to conduct least-cost analysis on its own at the time of an actual failure • Valuation analysis must include franchise value impact from not transferring uninsured deposits to BDI, consideration of advance dividend payment, depositor behavior impact from losses, etc. • Incorporates certain aspects of "Asset Valuation and Sales" content item from current rule
No corresponding item	<p>Asset portfolios</p> <ul style="list-style-type: none"> • Introduces new term "material asset portfolio" • Requires information on valuation methodology and sale impediments
Major Counterparties	<p>Eliminated, but relevant information is provided in connection with other content items, such as payment clearing and settlement systems; or obtained through supervisory or other information channels</p>
Off-balance-sheet Exposures	<p>Off-balance-sheet exposures</p> <ul style="list-style-type: none"> • Requires mapping to franchise components
Collateral Pledged	<p>To be obtained through supervisory or other information channels</p>
Trading, derivatives and hedges	<p>Qualified financial contracts</p> <ul style="list-style-type: none"> • Supplements information provided under QFC recordkeeping rule

	<ul style="list-style-type: none"> • Focused on relationship of QFCs to the CIDI's core business lines and franchise components, and their integration with other services provided to customers • Eliminates any possibility of exemption for CIDI's with de minimis QFC activities
Unconsolidated Balance Sheet of CIDI; Material Entity Financial Statements	Unconsolidated balance sheet; entity financial statements <ul style="list-style-type: none"> • No material changes
Payment, clearing and settlement systems	Payment, clearing, and settlement systems <ul style="list-style-type: none"> • Incorporates franchise component concept • Requires description of services provided as intermediary, agent, or correspondent bank
Capital Structure; Funding Sources	Capital structure; funding sources <ul style="list-style-type: none"> • Requires additional detail on funding generally, such as non-deposit liabilities • Requires description of liquidity and capital needs and resources available to each material entity, and capabilities to project and report near-term funding and liquidity needs
	Non-deposit claims <ul style="list-style-type: none"> • Requires description of ability to identify non-depositor unsecured creditors
Affiliate Funding, Transactions, Accounts, Exposures and Concentrations	Parent and parent company affiliate funding, transactions, accounts, exposures, and concentrations <ul style="list-style-type: none"> • No material changes
Systemically Important Functions	Economic effects of resolution <ul style="list-style-type: none"> • Reframes to focus on materiality to particular U.S. geographic areas, business sectors / product lines, or other financial institutions
Cross-Border Elements	Cross-border elements <ul style="list-style-type: none"> • Requires additional information on impediments to divestiture, transfer or continuation of foreign operations • Incorporated into other content items
Management Information Systems; Software Licenses; Intellectual Property	Management information systems; software licenses; intellectual property <ul style="list-style-type: none"> • Requires specific identification of MIS not owned by CIDI or licensed directly from the provider and description of obstacles to maintaining in resolution
Corporate Governance	Corporate governance <ul style="list-style-type: none"> • No material changes [but see preamble inconsistency with rule text]
Assessment of the Resolution Plan	CIDI's assessment of the resolution submission <ul style="list-style-type: none"> • No material changes
No Corresponding item	Methodology for material entity designation <ul style="list-style-type: none"> • Requires description of methodology for identifying material entities appropriate to nature, size, complexity, and scope of its operations
No Corresponding item	Digital services and electronic platforms

	<ul style="list-style-type: none">• Requires description of all digital services and electronic platforms offered to depositors, including significance to operations or customer relationships and impact on franchise value and deposit behavior
No Corresponding item	Communications playbook <ul style="list-style-type: none">• Requires development of communications playbook, including descriptions of CIDI's capabilities