

Quarterly Report on Bank Trading and Derivatives Activities

First Quarter 2024

Office of the Comptroller of the Currency Washington, D.C.

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About This Report

The Office of the Comptroller of the Currency's (OCC) quarterly report on bank trading and derivatives activities is based on call report information provided by all insured U.S. commercial banks and savings associations, reports filed by U.S. financial holding companies, and other published data. A total of 1,208 insured U.S. national and state commercial banks and savings associations reported trading and derivatives activities at the end of the first quarter of 2024. A small group of large financial institutions continues to dominate trading and derivatives activity in the U.S. commercial banking system. During the first quarter of 2024, four large commercial banks represented 87.6 percent of the total banking industry notional amounts and 64.5 percent of industry net current credit exposure (NCCE).

The OCC and other supervisors have dedicated examiners at the largest banks to continuously evaluate the credit, market, operational, reputation, and compliance risks of bank trading and derivatives activities. In addition to the OCC's supervisory activities, the OCC works with other financial supervisors and major market participants to address infrastructure, clearing, and margining issues in over-the-counter (OTC) derivatives. OCC activities include development of objectives and milestones for stronger trade processing and improved market transparency across derivative categories, migration of certain highly liquid products to clearinghouses, and requirements for posting and collecting margin.

This is the 114th edition of the OCC's *Quarterly Report on Bank Trading and Derivatives Activities*. The first report was published in 1995. Please send any comments or feedback on the structure and content of this report to QuarterlyDerivatives@occ.treas.gov.

Executive Summary

- Insured U.S. commercial banks and savings associations (collectively, banks) reported trading revenue of \$15.6 billion in the first quarter of 2024, \$4.0 billion more (34.2 percent) than in the previous quarter and \$2.0 billion less (11.1 percent) than a year earlier (see table 1).
- Credit exposure from derivatives increased in the first quarter of 2024 compared with the fourth quarter of 2023. NCCE increased \$11.0 billion, or 4.6 percent, to \$251.0 billion (see table 5).
- Derivative notional amounts increased in the first quarter of 2024 by \$13.6 trillion, or 7.1 percent, to \$206.1 trillion (see table 10).
- Derivative contracts remained concentrated in interest rate products, which totaled \$144.4 trillion or 70.1 percent of total derivative notional amounts (see table 10).

Revenue

¹ Values in the tables and figures in this report may not add up to the totals because of rounding.

² Institutions with total assets of less than \$5 billion have the option to file the Federal Financial Institutions Examination Council (FFIEC) 051 call report. Due to the limited amount of derivatives data provided by FFIEC 051 call report filers, this report provides this information separately and distinctly in table 25 in the appendix.

Insured U.S. Commercial Banks and Savings Associations' Trading Revenue

Insured U.S. commercial banks and savings associations reported \$15.6 billion in trading revenue in the first quarter of 2024, \$4.0 billion more (34.2 percent) than in the previous quarter and \$2.0 billion less (11.1 percent) than a year earlier (see table 1). The quarter-over-quarter increase in trading revenue was due to increases in revenue from foreign exchange, equity, and credit instruments. For a historical view of quarterly bank trading revenue by instrument, see figure 15a in the appendix.

Table 1: Quarterly Bank Trading Revenue, in Millions of Dollars

| Trading instruments | 1Q 2024 | 4Q 2023 | Q/Q change | Q/Q % change | 1Q 2023 | Y/Y change | Y/Y % change |
|-----------------------|----------|----------|---------------|-----------------|----------|-----------------|-----------------|
| Interest rate | \$1,817 | \$6,016 | -\$4,199 | -69.8% | \$5,721 | -\$3,904 | -68.2% |
| Foreign exchange | \$7,551 | \$2,334 | \$5,217 | 223.5% | \$4,439 | \$3,111 | 70.1% |
| Equity | \$4,814 | \$3,603 | \$1,211 | 33.6% | \$5,334 | -\$520 | -9.7% |
| Commodity and other | \$504 | \$773 | -\$269 | -34.8% | \$1,570 | -\$1,066 | -67.9% |
| Credit | \$944 | -\$1,077 | \$2,021 | 187.6% | \$516 | \$428 | 83.0% |
| Total trading revenue | \$15,630 | \$11,649 | \$3,981 | 34.2% | \$17,581 | -\$1,951 | -11.1% |

Source: Call reports, Schedule RI

Holding Company Trading Revenue

Consolidated bank holding company (BHC) trading performance provides a more complete picture of trading revenue in the banking system. As shown in table 2, consolidated holding company trading revenue of \$32.0 billion in the first quarter of 2024 was \$325 million less (1.0 percent) than in the previous quarter. The quarter-over-quarter decrease in trading revenue was due to decreases in revenue from interest rate and equity instruments. Year-over-year holding company trading revenue decreased by \$5.7 billion (15.1 percent). For a historical view of quarterly holding company trading revenue by instrument, see figure 15b in the appendix.

Table 2: Quarterly Holding Company Trading Revenue, in Millions of Dollars

| Trading instruments | 1Q 2024 | 4Q 2023 | Q/Q change | Q/Q % change | 1Q 2023 | Y/Y change | Y/Y % change |
|---------------------------|----------|----------|---------------|-----------------|----------|------------------|-----------------|
| Interest rate | \$4,491 | \$14,397 | -\$9,907 | -68.8% | \$11,955 | -\$7,464 | -62.4% |
| Foreign exchange | \$8,638 | \$1,768 | \$6,870 | 388.6% | \$5,760 | \$2,878 | 50.0% |
| Equity | \$13,059 | \$14,476 | -\$1,417 | -9.8% | \$13,714 | -\$655 | -4.8% |
| Commodity and other | \$1,990 | \$1,607 | \$383 | 23.8% | \$3,471 | -\$1,481 | -42.7% |
| Credit | \$3,800 | \$53 | \$3,746 | 7017.0% | \$2,770 | \$1,030 | 37.2% |
| Total BHC trading revenue | \$31,977 | \$32,302 | -\$325 | -1.0% | \$37,670 | - \$5,693 | -15.1% |

Source: Consolidated Financial Statements for Holding Companies—FR Y-9C, Schedule HI

Bank Trading Revenue as a Percentage of Consolidated Holding Company Trading Revenue

Before the 2008 financial crisis, trading revenue at banks typically ranged from 60 percent to 80 percent of consolidated BHC trading revenue. Since the 2008 financial crisis and the adoption of bank charters by the former investment banks, the percentage of bank trading revenue to consolidated BHC trading revenue has decreased and is typically between 30 percent and 50 percent. This decline reflects the significant amount of trading activity by the former investment banks that, while included in BHC results, remains outside insured commercial banks. More generally, insured U.S. commercial banks and savings associations have more limited legal authorities than their holding companies, particularly in the trading of commodity and equity products.

In the first quarter of 2024, banks generated 48.9 percent of consolidated holding company trading revenue, an increase from 36.1 percent in the previous quarter (see figure 1).

Figure 1: Bank Trading Revenue as a Percentage of Consolidated Holding Company Trading Revenue

Source: Consolidated Financial Statements for Holding Companies—FR Y-9C (Schedule HI) and call report (Schedule RI)

Counterparty Credit Risk

Counterparty credit risk is a significant risk in bank derivative trading activities. The notional amount of a derivative contract is a reference amount that determines contractual payments, but it is generally not an amount at risk. The credit risk in a derivative contract is a function of a number of variables, such as whether counterparties exchange notional principal, the volatility of the underlying market factors (interest rate, currency, commodity, equity, or corporate reference entity), the maturity and liquidity of the contract, and the creditworthiness of the counterparty.

Credit risk in derivatives differs from credit risk in loans because of the more uncertain nature of the potential credit exposure. Because the credit exposure is a function of movements in market factors, banks do not know, and can only estimate, how much the value of the derivative contract might be at various points in the future.

The credit exposure is bilateral in most derivative transactions, such as swaps (which make up the bulk of bank derivative contracts). Each party to the contract may (and, if the contract has a long enough tenor, probably will) have a credit exposure to the other party at various times during the contract's life. With a funded traditional loan, the amount at risk is the amount advanced to the borrower. The credit risk is unilateral as the bank faces the credit exposure of the borrower.

Measuring credit exposure in derivative contracts involves identifying those contracts on which a bank would lose value if the counterparty to a contract defaulted. The total of all contracts with positive value (i.e., derivative receivables) to the bank is the gross positive fair value (GPFV) and represents an initial measurement of credit exposure. The total of all contracts with negative value (i.e., derivative payables) to the bank is the gross negative fair value (GNFV) and represents a measurement of the exposure the bank poses to its counterparties.

GPFV decreased by \$69.0 billion (3.2 percent) in the first quarter of 2024 to \$2.1 trillion, primarily driven by a \$98.0 billion (15.9 percent) decrease in receivables from FX contracts and a \$13.0 billion (0.9 percent) decrease in receivables from interest rate contracts (see table 3a). GNFV decreased \$96.0 billion (4.5 percent) to \$2.0 trillion during the quarter, driven by a \$124.0 billion (19.8 percent) decrease in payables on FX contracts and a \$20.0 billion (1.5 percent) decrease in payables from interest rate contracts (see table 3b).

Table 3a: Gross Positive Fair Values, in Billions of Dollars

| Trading instruments | 1Q 2024 | 4Q 2023 | Q/Q change | Q/Q % change | 1Q 2023 | Y/Y change | Y/Y % change |
|---------------------|---------|---------|---------------|-----------------|---------|---------------|-----------------|
| Interest rate | \$1,318 | \$1,331 | - \$13 | -0.9% | \$1,405 | - \$87 | -6.2% |
| FX | \$516 | \$614 | -\$98 | -15.9% | \$534 | - \$18 | -3.3% |
| Equity | \$183 | \$149 | \$34 | 22.7% | \$132 | \$50 | 38.1% |
| Commodity & other | \$47 | \$42 | \$5 | 11.4% | \$57 | - \$10 | -17.6% |
| Credit | \$39 | \$36 | \$3 | 8.7% | \$40 | -\$1 | -2.5% |
| GPFV | \$2,103 | \$2,171 | -\$69 | -3.2% | \$2,168 | - \$65 | -3.0% |

Source: Call reports, Schedule RC-L

Table 3b: Gross Negative Fair Values, in Billions of Dollars

| Trading instruments | 1Q 2024 | 4Q 2023 | Q/Q change | Q/Q % change | 1Q 2023 | Y/Y change | Y/Y % change |
|---------------------|---------|---------|---------------|-----------------|---------|---------------|-----------------|
| Interest rate | \$1,255 | \$1,274 | -\$20 | -1.5% | \$1,341 | -\$86 | -6.4% |
| FX | \$504 | \$629 | -\$124 | -19.8% | \$531 | -\$26 | -5.0% |
| Equity | \$201 | \$158 | \$43 | 27.0% | \$138 | \$63 | 45.4% |
| Commodity & other | \$45 | \$41 | \$4 | 9.4% | \$54 | -\$9 | -16.2% |
| Credit | \$43 | \$42 | \$1 | 2.9% | \$41 | \$1 | 3.2% |
| GNFV | \$2,048 | \$2,144 | -\$96 | -4.5% | \$2,105 | - \$57 | -2.7% |

Source: Call reports, Schedule RC-L

Note: Numbers may not add up to total due to rounding.

A legally enforceable netting agreement between a bank and a counterparty creates a single legal obligation for all transactions (called a "netting set") under the agreement. Therefore, when banks have such agreements with their counterparties, contracts with negative values (an amount a bank would pay to its counterparty) can offset contracts with positive values (an amount owed by the counterparty to the bank), leaving an NCCE as shown in table 4.

Table 4: Netting Contract Examples

| Bank A portfolio with Counterparty B | Number of contracts | Value of contracts | Credit measure/metric |
|---|---------------------|--------------------|------------------------------------|
| Contracts with positive value to Bank A | 6 | \$500 | GPFV |
| Contracts with negative value to Bank A | 4 | -\$350 | GNFV |
| Total contracts | 10 | \$150 | NCCE to Bank A from Counterparty B |

Most derivative transactions that a bank has with an individual counterparty are subject to a legally enforceable netting agreement. Some transactions may be subject to the laws of a jurisdiction that does not provide legal certainty of netting agreements, in which case banks must regard such transactions as separate from the netting set. Other transactions may involve nonstandard contractual documentation. Transactions that are not subject to the same legally enforceable netting agreement have distinct values that cannot be netted and for which the appropriate current credit measure is the gross exposure to the bank if that amount is positive. While banks can net exposures within a netting set under the same netting agreement, they cannot net exposures across netting sets without a separate legally enforceable netting agreement. As a result, a bank's NCCE to a particular counterparty equals the sum of the GPFV of contracts less the dollar amount of netting benefits with that counterparty. A bank's NCCE across all counterparties equals the sum of its NCCE to each of its counterparties.

NCCE is the primary metric the OCC uses to evaluate credit risk in bank derivative activities. NCCE for insured U.S. commercial banks and savings associations increased by \$11.0 billion (4.6 percent) to \$251.0 billion in the first quarter of 2024 (see table 5). Legally enforceable netting agreements allowed banks to reduce GPFV exposures by 88.0 percent (\$1.9 trillion) in the first quarter of 2024.

Table 5: Net Current Credit Exposure, in Billions of Dollars

| Netting benefit ratio | 1Q 2024 | 4Q 2023 | Q/Q change | Q/Q % change |
|------------------------|---------|---------|---------------|-----------------|
| GPFV | \$2,103 | \$2,171 | - \$68 | -3.1% |
| NCCE RC-R | \$251 | \$240 | \$11 | 4.6% |
| Netting benefit RC-R | \$1,851 | \$1,931 | -\$80 | -4.1% |
| Netting benefit % RC-R | 88.0% | 88.9% | | -0.9% |

³ Banks report NCCE on two different schedules (RC-R and RC-L) of the call report, and the amounts reported are not the same because of differences in the scope of coverage. Neither measure comprehensively captures NCCE. RC-L includes exposure only from OTC derivative transactions; it excludes exchange-traded transactions. RC-R excludes transactions not subject to capital requirements. This report uses RC-R to measure NCCE.

NCCE peaked at \$804.0 billion at the end of 2008 during the financial crisis when interest rates had plunged, and credit spreads were very high (see figure 2). The decline in NCCE since 2008 has largely resulted from declines in the GPFV of interest rate and credit contracts. After a large increase in NCCE during the first quarter of 2020 as markets responded to the financial impact of the COVID-19 global pandemic, NCCE ended the first quarter of 2024 at \$251.0 billion as more normal market activity resumed.

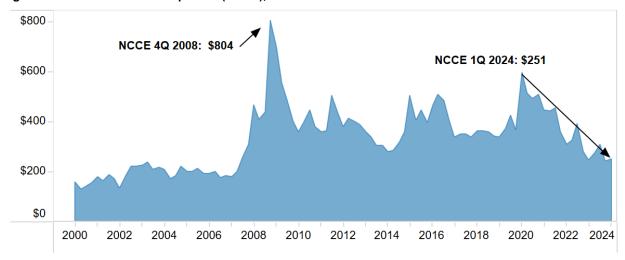


Figure 2: Net Current Credit Exposure (NCCE), in Billions of Dollars

Source: Call reports, Schedule RC-R

The bulk of NCCE in the financial system is concentrated in banks and securities firms (38.9 percent) and in corporations and other counterparties (55.2 percent) (see table 6). The combined exposure to hedge funds and sovereign governments was small (5.9 percent in total).

Table 6: Net Current Credit Exposure by Counterparty Type as a Percentage of Total Net Current Credit Exposure

| Quarter | Banks and securities firms | Hedge funds | Sovereign governments | Corporate and all other counterparties |
|---------|----------------------------|-------------|--------------------------|--|
| 1Q 2024 | 38.9% | 1.4% | 4.5% | 55.2% |
| 4Q 2023 | 34.6% | 2.3% | 5.0% | 58.1% |
| 4Q 2022 | 34.5% | 2.3% | 3.9% | 59.2% |
| 4Q 2021 | 37.9% | 2.0% | 7.4% | 52.6% |
| 4Q 2020 | 39.1% | 2.2% | 8.3% | 50.4% |
| 4Q 2019 | 44.2% | 2.5% | 9.2% | 44.1% |
| 4Q 2018 | 41.7% | 5.0% | 10.0% | 43.2% |
| 4Q 2017 | 41.7% | 3.1% | 7.9% | 47.3% |
| 4Q 2016 | 48.4% | 2.0% | 6.5% | 43.0% |

Source: Call reports, Schedule RC-L

A more risk-sensitive measure of credit exposure would consider the value of collateral held against counterparty exposures. Reporting banks held collateral valued at 127.8 percent of their

total NCCE at the end of the first quarter of 2024, up from 118.9 percent in the fourth quarter of 2023 (see table 7). Collateral held against hedge fund exposures increased in the first quarter to 891.9 percent. Bank exposures to hedge funds are secured because banks take initial margin on transactions with hedge funds, in addition to fully securing any current credit exposure. Collateral coverage of corporate and sovereign exposures is much less than coverage of financial institutions and hedge funds.

Table 7: Ratio of Fair Value (FV) Collateral to Net Current Credit Exposure

| Quarter | FV banks and securities firms | FV hedge funds | FV sovereign governments | FV corporate and all other counterparties | FV/NCCE % |
|---------|-------------------------------|----------------|-----------------------------|---|-----------|
| 1Q 2024 | 137.1% | 891.9% | 87.1% | 104.9% | 127.8% |
| 4Q 2023 | 142.0% | 574.3% | 79.1% | 90.8% | 118.9% |
| 4Q 2022 | 111.4% | 474.5% | 61.5% | 75.4% | 96.5% |
| 4Q 2021 | 128.6% | 687.6% | 69.3% | 76.0% | 108.0% |
| 4Q 2020 | 110.6% | 467.6% | 52.1% | 59.5% | 87.8% |
| 4Q 2019 | 130.0% | 485.9% | 48.3% | 91.8% | 114.5% |
| 4Q 2018 | 128.9% | 308.0% | 47.1% | 91.8% | 113.7% |
| 4Q 2017 | 124.4% | 495.5% | 25.1% | 89.8% | 111.5% |
| 4Q 2016 | 119.1% | 491.5% | 34.2% | 67.0% | 98.5% |

Source: Call reports, Schedule RC-L

The majority of collateral held by banks against NCCE is very liquid with 61.1 percent held in cash (both U.S. dollar and other currencies) and an additional 10.2 percent held in U.S. Treasuries and U.S. government agency securities (see table 8). Supervisors assess changes in the quality and liquidity of collateral held as a key early indicator of potential easing in credit terms. Examiners review the collateral management practices of derivative dealers as a regular part of their supervision activities.

Table 8: Composition of Collateral

| Quarter | Cash U.S. \$ | Cash other currencies | U.S. Treasury securities | U.S. government agency | Corp bonds | Equity securities | All other collateral |
|---------|--------------|-----------------------|--------------------------------|------------------------------|---------------|----------------------|----------------------|
| 1Q 2024 | 46.1% | 15.0% | 9.6% | 0.6% | 4.8% | 6.5% | 17.4% |
| 4Q 2023 | 46.2% | 15.1% | 10.3% | 0.7% | 4.1% | 6.7% | 17.0% |
| 4Q 2022 | 53.1% | 14.9% | 8.7% | 0.4% | 3.8% | 5.5% | 13.7% |
| 4Q 2021 | 39.3% | 24.5% | 8.1% | 0.9% | 1.6% | 8.2% | 17.3% |
| 4Q 2020 | 39.5% | 28.6% | 7.8% | 1.7% | 1.1% | 7.2% | 14.1% |
| 4Q 2019 | 34.4% | 24.5% | 11.6% | 1.7% | 2.3% | 7.6% | 17.7% |
| 4Q 2018 | 37.2% | 23.3% | 10.8% | 2.2% | 2.1% | 7.1% | 17.2% |
| 4Q 2017 | 37.6% | 25.5% | 10.3% | 1.9% | 2.5% | 5.7% | 16.5% |
| 4Q 2016 | 40.1% | 31.5% | 8.1% | 1.7% | 1.6% | 5.0% | 12.0% |

Market Risk

Value-at-Risk

Banks primarily control market risk in trading operations by establishing limits against potential losses. Banks use value-at-risk (VaR) to quantify the maximum expected loss over a specified time period and at a certain confidence level under relevant market conditions. Banks subject to the market risk capital rule, 12 CFR 3, subpart F, are required to report their VaR-based measures quarterly on Federal Financial Institutions Examination Council (FFIEC) Form 102. The VaR measurement is calculated daily using a one-tail, 99 percent confidence level, and a holding period equivalent to a 10-business-day movement in underlying risk factors, such as rates, spreads, and prices. Tables 9a and 9b show the quarter-over-quarter change in VaR, as well as the VaR-based capital charge, for banks most active in trading and derivatives activity. As shown in table 9a, market risk in trading operations, as measured by VaR, is a small proportion of their risk-based capital. Figure 22 in the appendix illustrates the historical trend in VaR measurements for these institutions.

Table 9a: Value-at-Risk, in Millions of Dollars

| Value-at-risk | JPMorgan Chase Bank NA | Citibank NA | Bank of America NA | Goldman Sachs Bank USA |
|----------------------------------|------------------------------|-------------|-----------------------|------------------------------|
| 1Q 2024 average 60-day VaR | \$243 | \$232 | \$92 | \$307 |
| 4Q 2023 average 60-day VaR | \$180 | \$205 | \$84 | \$344 |
| Q/Q change | \$63 | \$27 | \$8 | - \$37 |
| 1Q 2024 total risk-based capital | \$287,922 | \$163,065 | \$203,699 | \$62,441 |

Source: Market Risk Regulatory Report for Institutions Subject to the Market Risk Capital Rule—FFIEC 102

Table 9b: Value-at-Risk Capital Requirement, in Millions of Dollars

| Value-at-risk capital requirement | JPMorgan Chase Bank NA | Citibank NA | Bank of America NA | Goldman Sachs Bank USA |
|-----------------------------------|------------------------------|-------------|-----------------------|------------------------------|
| 1Q 2024 VaR capital requirement | \$729 | \$695 | \$276 | \$922 |
| 4Q 2023 VaR capital requirement | \$540 | \$615 | \$252 | \$1,033 |
| Q/Q change | \$189 | \$81 | \$24 | - \$111 |
| 1Q 2024 total risk-based capital | \$287,922 | \$163,065 | \$203,699 | \$62,441 |

Source: Market Risk Regulatory Report for Institutions Subject to the Market Risk Capital Rule—FFIEC 102

Volatility Index

Figure 3 shows the VIX, a volatility index,⁴ which measures the market's expectation of stock market volatility in the S&P 500 index over the next 30-day period. Higher volatility as represented by the VIX is associated with increased equity trading volume, which drives increased bank and holding company equity trading revenue. The figure illustrates that there was

⁴ VIX is the trademarked ticker symbol for the Chicago Board Options Exchange SPX Volatility Index.

an extended period of low volatility following the end of the 2008 financial crisis that continued until late in the first quarter of 2020. In mid-March 2020 volatility spiked as financial markets reacted to fears over the potential impact of the COVID-19 global pandemic. The VIX exceeded its previous high from the 2008 financial crisis before settling back to a more normal level of 13.0 percent at the end of the first quarter of 2024.

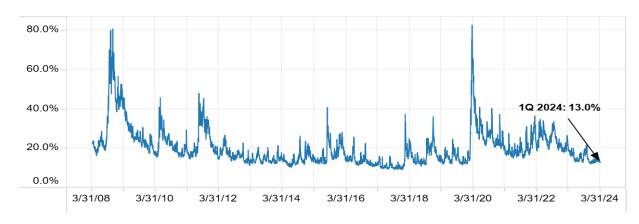


Figure 3: Volatility Index (VIX)

Source: Bloomberg

Level 3 Trading Assets

Another measure used to assess market risk is the volume of and changes in level 3 trading assets. Level 3 trading assets are assets whose fair value cannot be determined by using observable inputs, such as market prices. Since the peak of the financial crisis at the end of 2008, major dealers have reduced the volume of level 3 trading assets. Because the model inputs that determine the fair value of these exposures are not derived from observable market transactions, banks use their own model assumptions in determining their fair values. Level 3 trading assets peaked at \$204.0 billion at the end of 2008 (see figure 4). At the end of the first quarter of 2024, banks held \$37.0 billion of level 3 trading assets, up 5.7 percent from the previous quarter and 16.9 percent lower than a year ago. Level 3 trading assets are \$167.0 billion (81.9 percent) lower than the peak level from 2008.

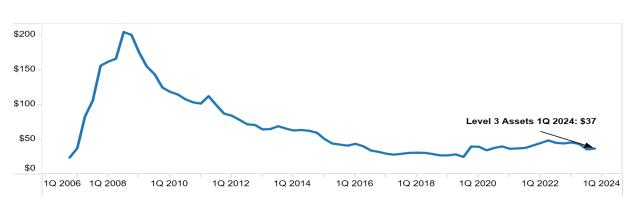


Figure 4: Level 3 Trading Assets, in Billions of Dollars

Notional Amounts of All Derivative Contracts

Changes in notional amounts are generally reasonable reflections of business activity and can provide insight into potential revenue and operational issues. The notional amount of derivative contracts, however, does not provide a useful measure of market or credit risk.

The total notional amount of derivative contracts held by banks in the first quarter increased by \$13.6 trillion (7.1 percent) to \$206.1 trillion from the previous quarter (see table 10). The increase in the notional amount of derivative contracts by underlying risk exposure was driven by increases across all instruments. Interest rate notional amounts continued to represent the majority of banks' derivative holdings at \$144.4 trillion, or 70.1 percent of total derivatives (see table 10).

Table 10: Derivative Notional Amounts by Underlying Risk Exposure Quarter-Over-Quarter, in Billions of Dollars

| Trading instrument | 1Q 2024 | 4Q 2023 | Q/Q change | Q/Q % change | 1Q 2023 | Y/Y change | Y/Y % change |
|---------------------|-----------|-----------|---------------|-----------------|-----------|---------------|-----------------|
| Interest rate | \$144,427 | \$136,274 | \$8,153 | 6.0% | \$160,260 | -\$15,833 | -9.9% |
| FX | \$49,856 | \$45,278 | \$4,578 | 10.1% | \$45,686 | \$4,169 | 9.1% |
| Equity | \$6,253 | \$5,674 | \$579 | 10.2% | \$5,001 | \$1,252 | 25.0% |
| Commodity and other | \$1,557 | \$1,493 | \$65 | 4.3% | \$1,575 | - \$17 | -1.1% |
| Credit derivatives | \$3,999 | \$3,746 | \$253 | 6.8% | \$5,079 | -\$1,080 | -21.3% |
| Total notional | \$206,091 | \$192,463 | \$13,628 | 7.1% | \$217,601 | -\$11,510 | -5.3% |

Source: Call reports, Schedule RC-L

The increase in the total notional amount of derivative contracts by contract type was primarily driven by increases in all derivatives contracts (see table 11). Swaps contracts remained the leading derivatives contract type at 60.6 percent of all notional amounts.

The four banks with the most derivative activity hold 87.6 percent of all bank derivatives, while the largest 25 banks account for nearly 100 percent of all contracts (see tables 15 and 17 and figure 10 in the appendix for more information).

Table 11: Derivative Notional Amounts by Contract Type Quarter-Over-Quarter, in Billions of Dollars

| Trading instrument | 1Q 2024 | 4Q 2023 | Q/Q change | Q/Q % change | 1Q 2023 | Y/Y change | Y/Y % change |
|----------------------|-----------|-----------|---------------|-----------------|-----------|---------------|-----------------|
| Futures and forwards | \$36,822 | \$31,806 | \$5,015 | 15.8% | \$34,502 | \$2,320 | 6.7% |
| Swaps | \$124,893 | \$117,303 | \$7,589 | 6.5% | \$137,730 | -\$12,837 | -9.3% |
| Options | \$40,378 | \$39,608 | \$770 | 1.9% | \$40,290 | \$88 | 0.2% |
| Credit derivatives | \$3,999 | \$3,746 | \$253 | 6.8% | \$5,079 | -\$1,080 | -21.3% |
| Total notional | \$206,091 | \$192,463 | \$13,628 | 7.1% | \$217,601 | -\$11,510 | -5.3% |

Credit Derivatives

The notional amounts of credit derivatives increased \$253.0 billion (6.8 percent) to \$4.0 trillion in the first quarter of 2024 (see table 11). As shown in the chart on the left of figure 5, credit default swaps are the dominant product, at \$3.3 trillion (83.7 percent) of all credit derivative notional amounts.

Credit derivative contracts referencing investment-grade entities with maturities from one to five years represented the largest segment of the market at \$1.9 trillion or 48.1 percent of all credit derivative notional amounts. Contracts of all tenors that reference investment-grade entities are \$2.9 trillion or 73.4 percent of the market (see the chart on the right in figure 5).

Sub-investment grade < 1 yr: \$260 Sub-investment Total Return Swaps: \$194 Other Credit Derivatives: \$142 grade > 5 yrs: Credit Options: \$315 Sub-investment grade Investment 1-5 yrs: **\$683** grade 1-5 yrs: \$1,923 Investment grade < 1 yr: Credit Default Swaps: \$3,348 Investment grade > 5 yrs: \$334

Figure 5: Credit Derivative Composition, in Billions of Dollars

Source: Call reports, Schedule RC-L

The notional amount for the 116 banks that net sold credit protection (i.e., assumed credit risk) was \$1.9 trillion, up \$128.2 billion (7.3 percent) from the fourth quarter of 2023 (see table 24 in the appendix). The notional amount for the 95 banks that net purchased credit protection (i.e., hedged credit risk) was \$2.1 trillion, \$125.0 billion lower (6.3 percent) than in the fourth quarter of 2023 (see table 24 in the appendix).

Compression Activity

Notional amounts of banks' derivative contracts have generally declined since 2014 because of trade compression efforts, leading to less need for risk management products. Trade compression continues to be a significant factor in reducing the amount of notional derivatives outstanding.

Trade compression aggregates a large number of swap contracts with similar factors, such as risk or cash flows, into fewer trades. Compression removes economic redundancy in a derivative book and reduces operational risk and capital costs for large banks. Trade compression activities increased in the first quarter of 2024, as shown in figure 6.

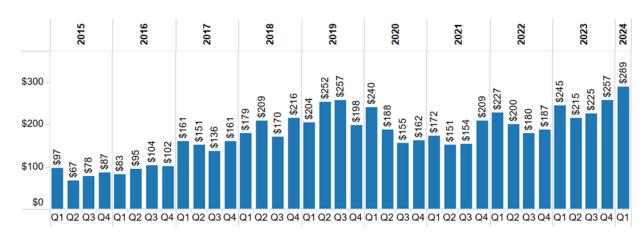


Figure 6: Quarterly Compression Activity, in Trillions of Dollars

Source: LCH Group

Centrally Cleared Derivative Contracts

In the first quarter of 2015, banks began reporting their volumes of cleared and uncleared derivative transactions, as well as risk weights for counterparties in each of these categories. In the first quarter of 2024, 35.9 percent of banks' derivative holdings were centrally cleared (see table 12). From a market factor perspective, 47.9 percent of interest rate derivative contracts' notional amounts outstanding were centrally cleared, while very little of the FX derivative market was centrally cleared. The bank-held credit derivative market remained largely uncleared, as 29.6 percent of credit derivative transactions were centrally cleared during the first quarter of 2024.

Centrally cleared derivative transactions were heavily concentrated at qualifying central counterparties, with 82.0 percent of notional amounts reflecting the 2 percent risk weight applicable to such counterparties.

Table 12: Centrally Cleared Derivative Contracts as a Percentage of Total Derivative Contracts

| Quarter | Interest rate | FX | Equity | Precious metals | Credit | Other | Total |
|---------|------------------|------|--------|-----------------|--------|-------|-------|
| 1Q 2024 | 47.9% | 3.0% | 25.2% | 6.9% | 29.6% | 13.2% | 35.9% |
| 4Q 2023 | 44.9% | 2.9% | 24.0% | 6.7% | 28.2% | 12.9% | 33.9% |
| 3Q 2023 | 49.7% | 3.1% | 23.4% | 6.8% | 32.5% | 14.0% | 37.8% |
| 2Q 2023 | 52.9% | 3.0% | 23.5% | 7.7% | 35.1% | 12.5% | 41.3% |
| 1Q 2023 | 52.2% | 3.0% | 24.7% | 7.3% | 30.9% | 12.6% | 40.5% |
| 4Q 2022 | 49.1% | 2.7% | 23.8% | 8.8% | 28.9% | 12.2% | 37.9% |
| 3Q 2022 | 54.3% | 3.0% | 23.9% | 6.6% | 30.6% | 12.9% | 41.7% |
| 2Q 2022 | 55.9% | 3.2% | 24.8% | 5.9% | 25.4% | 12.3% | 43.1% |
| 1Q 2022 | 56.1% | 2.9% | 24.3% | 6.4% | 33.8% | 12.4% | 43.4% |
| 4Q 2021 | 51.8% | 2.0% | 20.6% | 3.1% | 29.2% | 12.3% | 39.4% |
| 3Q 2021 | 50.5% | 2.1% | 21.4% | 2.6% | 35.3% | 13.2% | 39.0% |

Glossary of Terms

Bilateral netting: A legally enforceable arrangement between a bank and a counterparty that creates a single legal obligation covering all included individual contracts. This arrangement means that a bank's receivables or payables, in the event of the default or insolvency of one of the parties, would be the net sum of all positive and negative fair values of contracts included in the bilateral netting arrangement.

Centrally cleared derivative contract: A standardized derivative contract that is transacted bilaterally but submitted for clearing to a central counterparty, with the central counterparty becoming the ultimate counterparty to both the buyer and the seller.

Credit derivative: A financial contract that allows a party to take on or reduce credit exposure (generally on a bond, loan, or index). The OCC's derivatives survey includes OTC credit derivatives, such as credit default swaps, total return swaps, and credit spread options.

Derivative: A financial contract in which the value is derived from the performance of underlying market factors, such as interest rates, currency exchange rates, and commodity, credit, and equity prices. Derivative transactions include a wide assortment of financial contracts, such as structured debt obligations and deposits, swaps, futures, options, caps, floors, collars, forwards, and various combinations thereof.

Gross negative fair value (GNFV): The sum total of the fair values of contracts when the bank owes money to its counterparties, without taking netting into account. This amount represents the maximum losses the bank's counterparties would incur if the bank defaulted and there was no netting of contracts, and the counterparties held no bank collateral. GNFVs associated with credit derivatives are included.

Gross positive fair value (GPFV): The sum total of the fair values of contracts when the bank is owed money by its counterparties, without taking netting into account. This amount represents the maximum losses a bank would incur if all its counterparties defaulted and there was no netting of contracts, and the bank held no counterparty collateral. GPFVs associated with credit derivatives are included.

Net current credit exposure (NCCE): For a portfolio of derivative contracts, NCCE is the GPFV of contracts less the dollar amount of netting benefits. On any individual contract, current credit exposure (CCE) is the fair value of the contract if positive and zero when the fair value is negative or zero. NCCE is also the net amount owed to banks if all contracts were immediately liquidated.

Notional amount: The nominal or face amount that is used to calculate payments made on swaps and other risk management products. This amount generally does not change hands and is thus referred to as notional.

OTC derivative contracts: Privately negotiated derivative contracts that are transacted off organized exchanges.

Potential future exposure (PFE): An estimate of what the CCE could be over time, based on a supervisory formula in the agencies' risk-based capital rules. PFE is generally determined by multiplying the notional amount of the contract by a credit conversion factor that is based on the underlying market factor (e.g., interest rates, commodity prices, or equity prices) and the contract's remaining maturity. The risk-based capital rules, however, permit banks to adjust the formulaic PFE measure by the net-to-gross ratio, which proxies the risk-reduction benefits attributable to a valid bilateral netting contract. PFE data in this report use the amounts on which banks hold risk-based capital.

Qualifying central counterparties (QCCP): QCCPs are defined in 12 CFR 3.2 as a CCP either that the Financial Stability Oversight Council has designated systemically important under title VIII of the Dodd–Frank Wall Street Reform and Consumer Protection Act or that meets a series of standards. See 12 CFR 3.2 for a full definition.

Total credit exposure (TCE): The sum total of NCCE and PFE.

Total risk-based capital: The sum of tier 1 plus tier 2 capital. Tier 1 capital generally consists of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings, and tier 1 capital of consolidated subsidiaries that is not owned by the bank (minority interest), less regulatory adjustments and deductions. Tier 2 capital generally consists of subordinated debt, intermediate-term preferred stock, cumulative and long-term preferred stock, tier 2 capital of consolidated subsidiaries that is not owned by the bank (minority interest), and a portion of a bank's allowance for loan and lease losses less regulatory adjustments and deductions.

Trade compression: A significant factor in reducing the amount of notional derivatives outstanding. Trade compression aggregates a large number of swap contracts with similar factors, such as risk or cash flows, into fewer trades. Compression removes economic redundancy in a derivative book and reduces operational risks and capital costs for large banks.

Volatility index (VIX): A measure of the market's expectation of stock market volatility of S&P 500 index options over the next 30-day period.

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Table 13: Notional Amounts of Derivative Contracts

Top 25 Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars, March 31, 2024

| Bank name | Total assets | Total derivatives | Total futures (EXCH TR) | Total options (EXCH TR) | Total forwards (OTC) | Total swaps (OTC) | Total options (OTC) | Total credit derivatives (OTC) | Spot FX |
|--|--------------|-------------------|----------------------------|----------------------------|-------------------------|-------------------|------------------------|--------------------------------------|-------------|
| GOLDMAN SACHS BANK USA | \$549,188 | \$55,680,519 | \$1,291,432 | \$2,650,095 | \$6,381,900 | \$34,385,194 | \$10,468,266 | \$503,632 | \$951,854 |
| JPMORGAN CHASE BANK NA | 3,503,360 | 54,018,588 | 1,162,438 | 1,171,375 | 9,902,837 | 31,774,252 | 8,781,965 | 1,225,721 | 965,825 |
| CITIBANK NATIONAL ASSN | 1,698,856 | 49,865,522 | 497,116 | 828,000 | 6,692,836 | 32,467,627 | 7,910,605 | 1,469,338 | 442,009 |
| BANK OF AMERICA NA | 2,550,363 | 20,966,095 | 155,495 | 413,788 | 4,288,200 | 11,844,206 | 3,737,489 | 526,917 | 522,965 |
| WELLS FARGO BANK NA | 1,743,283 | 14,220,852 | 472,824 | 545,314 | 1,721,021 | 8,335,143 | 3,018,428 | 128,122 | 31,989 |
| STATE STREET BANK&TRUST CO | 333,667 | 2,798,721 | 29,885 | 0 | 2,708,272 | 30,741 | 29,823 | 0 | 58,137 |
| HSBC NA | 163,070 | 1,260,051 | 9,039 | 4,426 | 491,006 | 672,546 | 67,097 | 15,937 | 46,209 |
| U S BANK NATIONAL ASSN | 669,426 | 1,207,356 | 172 | 600 | 73,793 | 921,352 | 195,929 | 15,509 | 5,946 |
| BANK OF NEW YORK MELLON | 357,477 | 1,148,791 | 11,784 | 68 | 316,933 | 784,403 | 35,348 | 255 | 116,936 |
| PNC BANK NATIONAL ASSN | 561,950 | 682,589 | 9,967 | 14,938 | 23,633 | 560,214 | 61,789 | 12,049 | 1,780 |
| TD BANK NATIONAL ASSN | 369,860 | 401,188 | 0 | 0 | 1,942 | 399,175 | 71 | 0 | 0 |
| TRUIST BANK | 526,714 | 396,366 | 5,633 | 26,149 | 23,075 | 262,974 | 68,991 | 9,544 | 513 |
| CITIZENS BANK NATIONAL ASSN | 220,152 | 312,760 | 2,545 | 0 | 9,116 | 253,405 | 45,645 | 2,049 | 270 |
| NORTHERN TRUST CO | 155,573 | 299,279 | 0 | 0 | 270,989 | 27,835 | 455 | 0 | 50,314 |
| MORGAN STANLEY BANK NA | 212,723 | 283,462 | 1,118 | 60 | 27,989 | 215,994 | 15,627 | 22,674 | 3,531 |
| CAPITAL ONE NATIONAL ASSN | 478,877 | 267,630 | 25,728 | 0 | 13,089 | 221,301 | 841 | 6,671 | 308 |
| FIFTH THIRD BANK NA | 213,681 | 188,511 | 2,164 | 318 | 6,759 | 106,324 | 68,330 | 4,616 | 571 |
| REGIONS BANK | 153,946 | 173,998 | 181 | 0 | 3,114 | 138,753 | 26,586 | 5,364 | 17 |
| BMO BANK NATIONAL ASSN | 264,643 | 155,302 | 0 | 0 | 3,132 | 149,883 | 2,286 | 1 | 339 |
| KEYBANK NATIONAL ASSN | 185,233 | 134,631 | 742 | 0 | 5,738 | 110,750 | 17,287 | 113 | 50 |
| HUNTINGTON NATIONAL BANK | 192,859 | 102,732 | 717 | 0 | 5,453 | 76,268 | 16,037 | 4,257 | 71 |
| MANUFACTURERS&TRADERS TR CO | 214,668 | 78,625 | 0 | 0 | 3,420 | 70,992 | 4,214 | 0 | 255 |
| COMERICA BANK | 79,513 | 72,723 | 0 | 0 | 2,835 | 57,446 | 10,758 | 1,684 | 154 |
| BOKF NATIONAL ASSN | 49,948 | 65,295 | 3,456 | 3,452 | 43,332 | 8,249 | 6,805 | 0 | 0 |
| UBS BANK USA | 110,525 | 61,397 | 0 | 0 | 0 | 61,397 | 0 | 0 | 0 |
| Top 25 commercial banks, SAs & TCs with derivatives | \$15,559,556 | \$204,842,982 | \$3,682,436 | \$5,658,582 | \$33,020,415 | \$123,936,423 | \$34,590,672 | \$3,954,454 | \$3,200,043 |
| Other commercial banks, SAs & TCs with derivatives | 5,862,117 | 1,248,469 | 13,695 | 1,106 | 105,053 | 956,282 | 127,937 | 44,397 | 724 |
| Total all commercial banks, SAs & TCs with derivatives | 21,421,673 | 206,091,451 | 3,696,130 | 5,659,688 | 33,125,468 | 124,892,705 | 34,718,609 | 3,998,851 | 3,200,767 |

Note: Credit derivatives have been included in the sum of total derivatives. Credit derivatives have been included as an "over-the-counter" category, although the call report does not differentiate by market currently. Before the first quarter of 1995 total derivatives included spot FX. Beginning in that quarter, spot FX has been reported separately.

Table 14: Notional Amounts of Derivative Contracts (Holding Companies) Top 25 Holding Companies in Derivatives, in Millions of Dollars, March 31, 2024

| Holding company | Total assets | Total derivatives | Total futures (EXCH TR) | Total options (EXCH TR) | Total forwards (OTC) | Total swaps (OTC) | Total options (OTC) | Total credit derivatives (OTC) | Spot FX |
|---|--------------|-------------------|----------------------------|----------------------------|-------------------------|-------------------|------------------------|--------------------------------------|-------------|
| JPMORGAN CHASE & CO. | \$4,090,727 | \$53,615,020 | \$1,252,644 | \$1,898,538 | \$10,324,779 | \$30,575,820 | \$8,346,912 | \$1,216,327 | \$955,881 |
| CITIGROUP INC. | 2,432,510 | 48,669,175 | 690,462 | 3,883,473 | 7,757,875 | 27,786,734 | 7,448,061 | 1,102,570 | 441,000 |
| GOLDMAN SACHS GROUP, INC., THE | 1,698,440 | 44,974,810 | 1,732,580 | 4,285,807 | 6,020,383 | 21,266,679 | 10,465,208 | 1,204,153 | 349,034 |
| MORGAN STANLEY | 1,228,503 | 37,049,847 | 954,711 | 1,550,006 | 4,438,985 | 20,372,998 | 8,952,960 | 780,187 | 81,107 |
| BANK OF AMERICA CORPORATION | 3,273,803 | 36,929,690 | 608,669 | 1,663,367 | 7,714,087 | 21,111,263 | 4,910,954 | 921,350 | 423,184 |
| WELLS FARGO & COMPANY | 1,959,160 | 14,553,156 | 491,910 | 621,814 | 2,150,473 | 8,161,622 | 3,014,645 | 112,692 | 31,988 |
| MIZUHO AMERICAS LLC | 74,925 | 9,879,814 | 22,056 | 35,150 | 488,934 | 8,791,433 | 525,340 | 16,901 | 3,625 |
| SMBC AMERICAS HOLDINGS, INC. | 33,014 | 6,313,010 | 693,164 | 948,488 | 279,826 | 2,713,236 | 1,675,868 | 2,428 | 91 |
| HSBC NORTH AMERICA HOLDINGS INC. | 246,728 | 4,274,278 | 416,963 | 741,821 | 494,142 | 2,533,382 | 72,033 | 15,937 | 46,209 |
| STATE STREET CORPORATION | 338,003 | 2,790,567 | 30,030 | 0 | 2,708,272 | 22,441 | 29,824 | 0 | 58,137 |
| U.S. BANCORP | 683,606 | 1,196,131 | 172 | 600 | 73,375 | 910,546 | 195,929 | 15,509 | 5,946 |
| BANK OF NEW YORK MELLON CORPORATION, THE | 434,728 | 1,130,582 | 12,511 | 68 | 321,681 | 760,719 | 35,348 | 255 | 116,876 |
| RBC US GROUP HOLDINGS LLC | 166,734 | 784,454 | 235,851 | 248,986 | 12,936 | 285,746 | 345 | 590 | 155 |
| BARCLAYS US LLC | 198,127 | 730,860 | 20,405 | 258,692 | 415,016 | 35,842 | 105 | 800 | 6 |
| PNC FINANCIAL SERVICES GROUP, INC., THE | 566,181 | 661,521 | 10,132 | 14,938 | 27,433 | 535,065 | 61,789 | 12,164 | 1,780 |
| TD GROUP US HOLDINGS LLC | 530,324 | 505,639 | 37,546 | 3,727 | 46,325 | 417,758 | 283 | 0 | 0 |
| TRUIST FINANCIAL CORPORATION | 534,959 | 382,575 | 5,633 | 26,149 | 23,309 | 248,389 | 68,991 | 10,104 | 513 |
| CITIZENS FINANCIAL GROUP, INC. | 220,862 | 312,760 | 2,545 | 0 | 9,116 | 253,405 | 45,645 | 2,049 | 270 |
| CAPITAL ONE FINANCIAL CORPORATION | 481,720 | 303,794 | 25,728 | 0 | 13,195 | 257,360 | 841 | 6,671 | 308 |
| NORTHERN TRUST CORPORATION | 156,111 | 297,279 | 0 | 0 | 270,989 | 25,835 | 455 | 0 | 50,314 |
| BMO FINANCIAL CORP. | 295,575 | 257,285 | 42,229 | 3,391 | 57,297 | 150,647 | 2,345 | 1,375 | 353 |
| FIFTH THIRD BANCORP | 214,506 | 192,716 | 2,164 | 318 | 6,759 | 110,529 | 68,330 | 4,616 | 571 |
| REGIONS FINANCIAL CORPORATION | 155,227 | 172,623 | 181 | 0 | 3,139 | 137,353 | 26,586 | 5,364 | 17 |
| KEYCORP | 187,531 | 140,753 | 742 | 0 | 6,764 | 115,846 | 17,287 | 113 | 50 |
| AMERIPRISE FINANCIAL, INC. | 179,843 | 138,882 | 6,629 | 2,555 | 420 | 43,405 | 82,754 | 3,119 | 0 |
| Top 25 holding companies with derivatives | \$20,381,846 | \$266,257,221 | \$7,295,658 | \$16,187,888 | \$43,665,510 | \$147,624,053 | \$46,048,838 | \$5,435,274 | \$2,567,415 |

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives. Before the first quarter of 2005, total derivatives included spot FX. Beginning in that quarter, spot FX has been reported separately.

Source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, Schedule HC-L

Table 15: Distribution of Derivative Contracts

Top 25 Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars, March 31, 2024

| Bank Name | Total assets | Total derivatives | Percent exchange traded contracts | Percent OTC contracts | Percent interest rate contracts | Percent foreign exchange contracts | Percent equity contracts | Percent other contracts | Percent credit derivatives |
|---|--------------|-------------------|--|-----------------------|---------------------------------|--|--------------------------|-------------------------|-------------------------------|
| GOLDMAN SACHS BANK USA | \$549,188 | \$55,680,519 | 7.1 | 92.9 | 84.4 | 13.4 | 1.2 | 0.1 | 0.9 |
| JPMORGAN CHASE BANK NA | 3,503,360 | 54,018,588 | 4.3 | 95.7 | 65.6 | 25.9 | 4.8 | 1.4 | 2.3 |
| CITIBANK NATIONAL ASSN | 1,698,856 | 49,865,522 | 2.7 | 97.3 | 64.3 | 29.1 | 3.0 | 0.7 | 2.9 |
| BANK OF AMERICA NA | 2,550,363 | 20,966,095 | 2.7 | 97.3 | 62.9 | 29.2 | 4.9 | 0.5 | 2.5 |
| WELLS FARGO BANK NA | 1,743,283 | 14,220,852 | 7.2 | 92.8 | 79.2 | 16.8 | 2.5 | 0.6 | 0.9 |
| STATE STREET BANK&TRUST CO | 333,667 | 2,798,721 | 1.1 | 98.9 | 2.2 | 96.8 | 0.0 | 1.0 | 0.0 |
| HSBC NA | 163,070 | 1,260,051 | 1.1 | 98.9 | 10.7 | 84.5 | 1.3 | 2.1 | 1.3 |
| U S BANK NATIONAL ASSN | 669,426 | 1,207,356 | 0.1 | 99.9 | 88.9 | 8.9 | 0.0 | 0.9 | 1.3 |
| BANK OF NEW YORK MELLON | 357,477 | 1,148,791 | 1.0 | 99.0 | 20.0 | 79.6 | 0.4 | 0.0 | 0.0 |
| PNC BANK NATIONAL ASSN | 561,950 | 682,589 | 3.6 | 96.4 | 91.4 | 3.8 | 1.3 | 1.7 | 1.8 |
| TD BANK NATIONAL ASSN | 369,860 | 401,188 | 0.0 | 100.0 | 99.6 | 0.4 | 0.0 | 0.0 | 0.0 |
| TRUIST BANK | 526,714 | 396,366 | 8.0 | 92.0 | 78.5 | 6.2 | 10.6 | 2.2 | 2.4 |
| CITIZENS BANK NATIONAL ASSN | 220,152 | 312,760 | 0.8 | 99.2 | 89.3 | 9.7 | 0.0 | 0.3 | 0.7 |
| NORTHERN TRUST CO | 155,573 | 299,279 | 0.0 | 100.0 | 9.1 | 90.5 | 0.3 | 0.0 | 0.0 |
| MORGAN STANLEY BANK NA | 212,723 | 283,462 | 0.4 | 99.6 | 38.0 | 39.0 | 15.0 | 0.0 | 8.0 |
| CAPITAL ONE NATIONAL ASSN | 478,877 | 267,630 | 9.6 | 90.4 | 84.0 | 6.1 | 0.0 | 7.3 | 2.5 |
| FIFTH THIRD BANK NA | 213,681 | 188,511 | 1.3 | 98.7 | 66.5 | 19.2 | 2.4 | 9.4 | 2.4 |
| REGIONS BANK | 153,946 | 173,998 | 0.1 | 99.9 | 93.3 | 1.3 | 0.0 | 2.3 | 3.1 |
| BMO BANK NATIONAL ASSN | 264,643 | 155,302 | 0.0 | 100.0 | 96.5 | 2.0 | 1.5 | 0.0 | 0.0 |
| KEYBANK NATIONAL ASSN | 185,233 | 134,631 | 0.6 | 99.4 | 86.8 | 4.7 | 0.0 | 8.4 | 0.1 |
| HUNTINGTON NATIONAL BANK | 192,859 | 102,732 | 0.7 | 99.3 | 89.8 | 4.7 | 0.7 | 0.6 | 4.1 |
| MANUFACTURERS&TRADERS TR CO | 214,668 | 78,625 | 0.0 | 100.0 | 98.2 | 1.8 | 0.0 | 0.0 | 0.0 |
| COMERICA BANK | 79,513 | 72,723 | 0.0 | 100.0 | 74.4 | 3.9 | 0.0 | 19.4 | 2.3 |
| BOKF NATIONAL ASSN | 49,948 | 65,295 | 10.6 | 89.4 | 76.8 | 0.2 | 0.1 | 23.0 | 0.0 |
| UBS BANK USA | 110,525 | 61,397 | 0.0 | 100.0 | 100.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Top 25 commercial banks, SAs & TCs with derivatives | \$15,559,556 | \$204,842,982 | \$9,341,018 | \$195,501,964 | \$143,299,161 | \$49,809,171 | \$6,251,890 | \$1,528,307 | \$3,954,454 |
| Other commercial banks, SAs & TCs with derivatives | 5,862,117 | 1,248,469 | 14,801 | 1,233,668 | 1,127,878 | 46,370 | 749 | 29,075 | 44,397 |
| Total all commercial banks, SAs & TCs with derivatives | 21,421,673 | 206,091,451 | 9,355,819 | 196,735,632 | 144,427,039 | 49,855,541 | 6,252,639 | 1,557,382 | 3,998,851 |
| Top 25 Commercial Banks, SAs & TCs with derivatives: percentage of total | | 99.4 | 4.5 | 94.9 | 69.5 | 24.2 | 3.0 | 0.7 | 1.9 |
| Other commercial banks, SAs & TCs with derivatives: percentage of total | | 0.6 | 0.0 | 0.6 | 0.5 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total all commercial banks, SAs & TCs with derivatives: percentage of total | | 100.0 | 4.5 | 95.5 | 70.1 | 24.2 | 3.0 | 0.8 | 1.9 |

Note: Currently, the call report does not differentiate credit derivatives by over-the-counter or exchange-traded. Credit derivatives have been included in the "over-the-counter" category as well as in the sum of total derivatives here. "FX" does not include spot FX. "Other" is defined as the sum of commodity and equity contracts.

Table 16: Credit Equivalent Exposures

Top 25 Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars, March 31, 2024

| Bank Name | Total assets | Total derivatives | Total risk-based capital | Bilaterally netted current credit exposure | Potential future exposure | Total credit exposure from all contracts | Percent of total credit exposure to capital |
|--|--------------|-------------------|-----------------------------|---|------------------------------|--|---|
| GOLDMAN SACHS BANK USA | \$549,188 | \$55,680,519 | \$62,441 | \$12,588 | \$69,898 | \$82,486 | 132 |
| JPMORGAN CHASE BANK NA | 3,503,360 | 54,018,588 | 287,922 | 81,402 | 236,432 | 317,834 | 110 |
| CITIBANK NATIONAL ASSN | 1,698,856 | 49,865,522 | 163,065 | 39,028 | 156,368 | 195,396 | 120 |
| BANK OF AMERICA NA | 2,550,363 | 20,966,095 | 203,699 | 29,195 | 60,851 | 90,046 | 44 |
| WELLS FARGO BANK NA | 1,743,283 | 14,220,852 | 166,353 | 38,053 | 20,602 | 58,655 | 35 |
| STATE STREET BANK&TRUST CO | 333,667 | 2,798,721 | 18,380 | 5,476 | 21,274 | 26,750 | 146 |
| HSBC NA | 163,070 | 1,260,051 | 19,298 | 2,806 | 3,216 | 6,022 | 31 |
| U S BANK NATIONAL ASSN | 669,426 | 1,207,356 | 68,892 | 5,048 | 9,318 | 14,367 | 21 |
| BANK OF NEW YORK MELLON | 357,477 | 1,148,791 | 21,143 | 5,481 | 10,697 | 16,178 | 77 |
| PNC BANK NATIONAL ASSN | 561,950 | 682,589 | 54,542 | 4,649 | -2,159 | 2,490 | 5 |
| TD BANK NATIONAL ASSN | 369,860 | 401,188 | 41,797 | 24 | 1,627 | 1,651 | 4 |
| TRUIST BANK | 526,714 | 396,366 | 55,755 | 417 | 3,172 | 3,589 | 6 |
| CITIZENS BANK NATIONAL ASSN | 220,152 | 312,760 | 22,574 | 413 | 1,782 | 2,195 | 10 |
| NORTHERN TRUST CO | 155,573 | 299,279 | 12,104 | 1,585 | 4,785 | 6,370 | 53 |
| MORGAN STANLEY BANK NA | 212,723 | 283,462 | 24,033 | 294 | 4,852 | 5,146 | 21 |
| CAPITAL ONE NATIONAL ASSN | 478,877 | 267,630 | 53,384 | 3,093 | 6,403 | 9,496 | 18 |
| FIFTH THIRD BANK NA | 213,681 | 188,511 | 22,467 | 1,713 | 3,158 | 4,871 | 22 |
| REGIONS BANK | 153,946 | 173,998 | 16,036 | 422 | 636 | 1,058 | 7 |
| BMO BANK NATIONAL ASSN | 264,643 | 155,302 | 26,744 | 353 | 282 | 634 | 2 |
| KEYBANK NATIONAL ASSN | 185,233 | 134,631 | 20,735 | 558 | 588 | 1,147 | 6 |
| HUNTINGTON NATIONAL BANK | 192,859 | 102,732 | 17,908 | 1,737 | 928 | 2,665 | 15 |
| MANUFACTURERS&TRADERS TR CO | 214,668 | 78,625 | 20,280 | 263 | 249 | 512 | 3 |
| COMERICA BANK | 79,513 | 72,723 | 9,512 | 593 | 1,280 | 1,873 | 20 |
| BOKF NATIONAL ASSN | 49,948 | 65,295 | 4,784 | 826 | 1,186 | 2,012 | 42 |
| UBS BANK USA | 110,525 | 61,397 | 10,231 | 0 | 163 | 163 | 2 |
| Top 25 commercial banks, SAs & TCs with derivatives | \$15,559,556 | \$204,842,982 | \$1,424,080 | \$236,017 | \$617,587 | \$853,605 | 60 |
| Other commercial banks, SAs & TCs with derivatives | 5,862,117 | 1,248,469 | 613,995 | 15,386 | 9,907 | 25,293 | 4 |
| Total all commercial banks, SAs & TCs with derivatives | 21,421,673 | 206,091,451 | 2,038,074 | 251,403 | 627,494 | 878,897 | 43 |

Note: Total credit exposure is defined as the credit equivalent amount from derivative contracts (RC-R column B lines 20 and 21), which is the sum of netted current credit exposure and PFE. The total credit exposure to capital ratio is calculated using risk-based capital (tier 1 plus tier 2 capital). Currently, the call report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives here.

Table 17: Notional Amounts of Derivative Contracts Held for TradingTop Four Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars, March 31, 2024

| Bank name | Total assets | Total derivatives | Total held for trading & MTM | Percent held for trading & MTM | Total not held for trading & MTM | Percent not held for trading & MTM |
|--|--------------|-------------------|------------------------------|---|----------------------------------|---|
| GOLDMAN SACHS BANK USA | \$521,102 | \$549,188 | \$55,680,519 | \$55,140,000 | 99.9 | \$36,887 |
| JPMORGAN CHASE BANK NA | 3,395,126 | 3,503,360 | 54,018,588 | 52,057,376 | 98.6 | 735,491 |
| CITIBANK NATIONAL ASSN | 1,684,710 | 1,698,856 | 49,865,522 | 48,286,313 | 99.8 | 109,871 |
| BANK OF AMERICA NA | 2,540,116 | 2,550,363 | 20,966,095 | 18,764,329 | 91.8 | 1,674,849 |
| Top four commercial banks, SAs & TCs with derivatives | \$8,301,767 | \$180,530,724 | \$174,248,018 | 98.6 | \$2,557,098 | 1.4 |
| Other commercial banks, SAs & TCs with derivatives | 13,119,906 | 25,560,727 | 22,192,065 | 87.8 | 3,095,419 | 12.2 |
| Total all commercial banks, SAs & TCs with derivatives | 21,421,673 | 206,091,451 | 196,440,083 | 97.2 | 5,652,517 | 2.8 |

Note: Currently, the call report does not differentiate between traded and not-traded credit derivatives. Credit derivatives have been excluded from the sum of total derivatives here.

Table 18: Gross Fair Values of Derivative Contracts

Top Four Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars, March 31, 2024

| Bank name | Total assets | Total derivatives | Trading gross positive fair value* | Trading gross negative fair value** | Not for trading gross positive fair value* | Not for trading gross negative fair value** | Credit derivatives gross positive fair value | Credit derivatives gross negative fair value** |
|--|--------------|-------------------|--|---|--|---|--|--|
| GOLDMAN SACHS BANK USA | \$549,188 | \$55,680,519 | \$677,859 | \$665,280 | \$182 | \$66 | \$6,496 | \$7,554 |
| JPMORGAN CHASE BANK NA | 3,503,360 | 54,018,588 | 581,492 | 567,293 | 4,962 | 1,557 | 10,762 | 13,033 |
| CITIBANK NATIONAL ASSN | 1,698,856 | 49,865,522 | 414,264 | 402,407 | 2,009 | 1,339 | 16,009 | 15,890 |
| BANK OF AMERICA NA | 2,550,363 | 20,966,095 | 153,742 | 139,030 | 40,342 | 45,200 | 4,273 | 3,954 |
| Top four commercial banks, SAs & TCs with derivatives | \$8,301,767 | \$180,530,724 | \$1,827,357 | \$1,774,010 | \$47,495 | \$48,162 | \$37,540 | \$40,431 |
| Other commercial banks, SAs & TCs with derivatives | 13,119,906 | 25,560,727 | 144,712 | 145,923 | 44,042 | 37,261 | 1,420 | 2,396 |
| Total all commercial banks, SAs & TCs with derivatives | 21,421,673 | 206,091,451 | 1,972,069 | 1,919,933 | 91,537 | 85,423 | 38,960 | 42,827 |

^{*} Market value of contracts that have a positive fair value as of the end of the quarter.

Note: Currently, the call report does not differentiate between traded and non-traded credit derivatives. Credit derivatives have been included in the sum of total derivatives here.

^{**} Market value of contracts that have a negative fair value as of the end of the quarter.

Table 19: Trading Revenues From Cash Instruments and Derivatives

Top Four Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars: Revenue Figures are for the Quarter (Not Year-to-Date), March 31, 2024

| Bank name | Total assets | Total derivatives | Total trading revenues from cash & off- balance sheet positions | Trading revenue from interest rate positions | Trading revenue from foreign exchange positions | Trading revenue from equity positions | Trading revenue from commodity & other positions | Trading revenue from credit positions |
|--|--------------|-------------------|---|--|--|--|---|---|
| GOLDMAN SACHS BANK USA | \$549,188 | \$55,680,519 | 2,267 | -1,311 | 3,008 | 223 | 12 | 335 |
| JPMORGAN CHASE BANK NA | 3,503,360 | 54,018,588 | 7,500 | 1,448 | 1,088 | 4,200 | 271 | 493 |
| CITIBANK NATIONAL ASSN | 1,698,856 | 49,865,522 | 1,656 | 1,162 | 1,263 | -813 | 54 | -10 |
| BANK OF AMERICA NA | 2,550,363 | 20,966,095 | 1,850 | 530 | 652 | 523 | 96 | 49 |
| Top four commercial banks, SAs & TCs with derivatives | \$8,301,767 | \$180,530,724 | 13,273 | 1,829 | 6,011 | 4,133 | 433 | 867 |
| Other commercial banks, SAs & TCs with derivatives | 13,119,906 | 25,560,727 | 2,357 | -12 | 1,540 | 681 | 71 | 77 |
| Total all commercial banks, SAs & TCs with derivatives | 21,421,673 | 206,091,451 | 15,630 | 1,817 | 7,551 | 4,814 | 504 | 944 |

Note: Effective in the first quarter of 2007, trading revenues from credit exposures are reported separately, along with the four other types of exposures. The total derivatives column includes credit exposures. Trading revenue is defined here as "trading revenue from cash instruments and off-balance-sheet derivative instruments."

Source: Call reports, Schedules RC-L and Schedule RI

Table 20: Notional Amounts of Derivative Contracts by Contract Type and Maturity (Interest Rate and Foreign Exchange Rate)

Top Four Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars, March 31, 2024

| Bank name | Total assets | Total derivatives | Interest rate maturity < 1 year | Interest rate maturity 1-5 years | Interest rate maturity > 5 years | Interest rate: all maturities | Foreign exchange rate maturity <1 year | Foreign exchange rate maturity 1-5 years | Foreign exchange rate maturity > 5 years | Foreign exchange rate: all maturities |
|--|--------------|-------------------|---------------------------------------|--|--|----------------------------------|---|---|---|---|
| GOLDMAN SACHS BANK USA | \$549,188 | \$55,680,519 | \$23,929,422 | \$9,145,590 | \$8,455,964 | \$41,530,976 | \$5,972,012 | \$1,066,339 | \$768,917 | \$7,807,268 |
| JPMORGAN CHASE BANK NA | 3,503,360 | 54,018,588 | 32,978,952 | 7,413,016 | 6,480,506 | 46,872,474 | 10,205,045 | 2,647,140 | 1,291,977 | 14,144,162 |
| CITIBANK NATIONAL ASSN | 1,698,856 | 49,865,522 | 21,406,991 | 4,557,576 | 3,312,955 | 29,277,522 | 10,344,302 | 2,174,470 | 1,011,620 | 13,530,392 |
| BANK OF AMERICA NA | 2,550,363 | 20,966,095 | 5,442,866 | 4,907,740 | 3,124,170 | 13.474.776 | 5,092,446 | 511.464 | 329,483 | 5,933,393 |
| Top four commercial banks, SAs & TCs with derivatives | \$8,301,767 | \$180,530,724 | \$83,758,231 | \$26,023,922 | \$21,373,595 | \$131,155,748 | \$31,613,805 | \$6,399,413 | \$3,401,997 | \$41,415,215 |
| Other commercial banks, SAs & TCs with derivatives | 13,119,906 | 25,560,727 | 12,368,629 | 3,072,757 | 1,014,923 | 16,456,309 | 7,391,420 | 327,286 | 83,709 | 7,802,415 |
| Total all commercial banks, SAs & TCs with derivatives | 21,421,673 | 206,091,451 | 96,126,860 | 29,096,679 | 22,388,518 | 147,612,057 | 39,005,225 | 6,726,699 | 3,485,706 | 49,217,630 |

Note: Beginning January 1, 2022, the largest banks are required to calculate their derivative exposure amount for regulatory capital purposes using the Standardized Approach for Counterparty Credit Risk (SA-CCR). Refer to the call report instructions and OCC Bulletin 2020-7, "Standardized Approach for Counterparty Credit Risk: Final Rule," for additional information on the SA-CCR exposure calculation.

Table 21: Notional Amounts of Derivative Contracts by Contract Type and Maturity (Precious Metals)

Top Four Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars, March 31, 2024

| Bank name | Total assets | Total derivatives | Precious metals maturity < 1 year | Precious metals maturity 1-5 years | Precious metals maturity > 5 years | Precious metals: all maturities |
|--|--------------|-------------------|--|---|---|---------------------------------------|
| GOLDMAN SACHS BANK USA | \$549,188 | \$55,680,519 | \$132 | \$12 | \$0 | \$144 |
| JPMORGAN CHASE BANK NA | 3,503,360 | 54,018,588 | 232,730 | 24,842 | 18 | 257,590 |
| CITIBANK NATIONAL ASSN | 1,698,856 | 49,865,522 | 94,332 | 7,490 | 0 | 101,822 |
| BANK OF AMERICA NA | 2,550,363 | 20,966,095 | 57,765 | 10,701 | 0 | 68,466 |
| Top four commercial banks, SAs & TCs with derivatives | \$8,301,767 | \$180,530,724 | \$384,959 | \$43,045 | \$18 | \$428,022 |
| Other commercial banks, SAs & TCs with derivatives | 13,119,906 | 25,560,727 | 9,837 | 766 | 0 | 10,604 |
| Total all commercial banks, SAs & TCs with derivatives | 21,421,673 | 206,091,451 | 394,796 | 43,811 | 18 | 438,626 |

Note: Beginning January 1, 2022, the largest banks are required to calculate their derivative exposure amount for regulatory capital purposes using the Standardized Approach for Counterparty Credit Risk (SA-CCR). Under SA-CCR gold derivatives are considered precious metals derivative contracts rather than an exchange rate derivative contract, resulting in an increase in reported precious metals derivative contracts compared with prior quarters. Refer to the call report instructions and OCC Bulletin 2020-7, "Standardized Approach for Counterparty Credit Risk: Final Rule," for additional information on the SA-CCR exposure calculation.

Table 22: Notional Amounts of Derivative Contracts by Contract Type and Maturity (Other Commodity and Equity)

Top Four Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars, March 31, 2024

| Bank name | Total assets | Total derivatives | Other commodity maturity < 1 year | Other commodity maturity 1-5 years | Other commodity maturity > 5 years | Other commodity: all maturities | Equity maturity <1 year | Equity maturity 1-5 tears | Equity maturity > 5 years | Equity: all maturities |
|--|--------------|-------------------|--|---|------------------------------------|---------------------------------------|----------------------------|---------------------------------|---------------------------------|---------------------------|
| GOLDMAN SACHS BANK USA | \$549,188 | \$55,680,519 | \$44,464 | \$15,558 | \$332 | \$60,354 | \$550,090 | \$61,911 | \$17,401 | \$629,402 |
| JPMORGAN CHASE BANK NA | 3,503,360 | 54,018,588 | 881,747 | 131,996 | 3,352 | 1,017,095 | 3,677,469 | 769,328 | 54,526 | 4,501,323 |
| CITIBANK NATIONAL ASSN | 1,698,856 | 49,865,522 | 130,420 | 41,585 | 252 | 172,257 | 702,279 | 144,499 | 11,055 | 857,833 |
| BANK OF AMERICA NA | 2,550,363 | 20,966,095 | 38,447 | 7,640 | 311 | 46,398 | 772,421 | 278,502 | 17,882 | 1,068,805 |
| Top four commercial banks, SAs & TCs with derivatives | \$8,301,767 | \$180,530,724 | \$1,095,078 | \$196,779 | \$4,247 | \$1,296,104 | \$5,702,259 | \$1,254,240 | \$100,864 | \$7,057,363 |
| Other commercial banks, SAs & TCs with derivatives | 13,119,906 | 25,560,727 | 106,514 | 90,313 | 1,909 | 198,736 | 344,983 | 147,014 | 9,846 | 501,843 |
| Total all commercial banks, SAs & TCs with derivatives | 21,421,673 | 206,091,451 | 1,201,592 | 287,092 | 6,156 | 1,494,840 | 6,047,242 | 1,401,254 | 110,710 | 7,559,206 |

Note: Beginning January 1, 2022, the largest banks are required to calculate their derivative exposure amount for regulatory capital purposes using the Standardized Approach for Counterparty Credit Risk (SA-CCR). Refer to the call report instructions and OCC Bulletin 2020-7, "Standardized Approach for Counterparty Credit Risk: Final Rule," for additional information on the SA-CCR exposure calculation.

Table 23: Notional Amounts of Credit Derivative Contracts by Contract Type and Maturity (Investment Grade and Sub-Investment Grade) Top Four Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars, March 31, 2024

| Bank name | Total assets | Total derivatives | Total credit derivatives | Investment grade maturity <1 year | Investment grade maturity 1-5 years | Investment grade maturity >5 years | Investment grade all maturities | Sub- investment grade maturity <1 year | Sub- investment grade maturity 1-5 years | Sub- investment grade maturity >5 years | Sub- investment grade all maturities |
|--|--------------|-------------------|-----------------------------|--|--|---|---------------------------------------|--|--|---|---|
| GOLDMAN SACHS BANK USA | \$549,188 | \$55,680,519 | \$503,632 | \$43,375 | \$198,464 | \$43,763 | \$285,602 | \$47,611 | \$135,848 | \$34,571 | \$218,030 |
| JPMORGAN CHASE BANK NA | 3,503,360 | 54,018,588 | 1,225,721 | 241,682 | 559,388 | 140,037 | 941,107 | 78,047 | 167,970 | 38,597 | 284,614 |
| CITIBANK NATIONAL ASSN | 1,698,856 | 49,865,522 | 1,469,338 | 219,702 | 852,879 | 67,728 | 1,140,309 | 76,729 | 228,305 | 23,995 | 329,029 |
| BANK OF AMERICA NA | 2,550,363 | 20,966,095 | 526,917 | 117,269 | 205,651 | 63,775 | 386,695 | 45,632 | 83,679 | 10,911 | 140,222 |
| Top four commercial banks, SAs & TCs with derivatives | \$8,301,767 | \$180,530,724 | \$3,725,608 | \$622,028 | \$1,816,382 | \$315,303 | \$2,753,713 | \$248,019 | \$615,802 | \$108,074 | \$971,895 |
| Other commercial banks, SAs & TCs with derivatives | 13,119,906 | 25,560,727 | 273,243 | 58,384 | 106,592 | 18,695 | 183,672 | 11,481 | 66,767 | 11,323 | 89,571 |
| Total all commercial banks, SAs & TCs with derivatives | 21,421,673 | 206,091,451 | 3,998,851 | 680,412 | 1,922,974 | 333,998 | 2,937,385 | 259,500 | 682,569 | 119,397 | 1,061,466 |

Table 24: Distribution of Credit Derivative Contracts Held for TradingTop 25 Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars, March 31, 2024

| Bank name | Total assets | Total derivatives | Total credit derivatives | Total credit derivatives purchased | Total credit derivatives sold | Purchased credit default swaps | Purchased total return swaps | Purchased credit options | Purchased other credit derivatives | Sold credit default swaps | Sold total return swaps | Sold credit options | Sold other credit derivatives |
|--|--------------|-------------------|-----------------------------|--|----------------------------------|--------------------------------------|------------------------------------|--------------------------------|---|------------------------------|-------------------------------|---------------------|--|
| GOLDMAN SACHS BANK USA | \$549,188 | \$55,680,519 | \$503.632 | \$278.892 | \$224,740 | \$261.072 | \$5.693 | \$11.907 | \$220 | \$208.939 | \$3,765 | \$11.842 | \$194 |
| JPMORGAN CHASE BANK NA | 3,503,360 | 54,018,588 | 1,225,721 | 644,951 | 580,770 | 536,674 | 41,034 | 61,461 | 5,782 | 503,221 | 12,682 | 64,829 | 38 |
| CITIBANK NATIONAL ASSN | 1,698,856 | 49,865,522 | 1,469,338 | 761,892 | 707,446 | 689,831 | 30,469 | 41,592 | 0 | 650,592 | 11,222 | 45,632 | 0 |
| BANK OF AMERICA NA | 2,550,363 | 20,966,095 | 526,917 | 277,993 | 248,924 | 220,831 | 18,362 | 38,800 | 0 | 207,205 | 3,481 | 38,238 | 0 |
| WELLS FARGO BANK NA | 1,743,283 | 14,220,852 | 128,122 | 68,993 | 59,129 | 10,485 | 32,841 | 325 | 25,342 | 12,553 | 29,290 | 0 | 17,286 |
| STATE STREET BANK&TRUST CO | 333,667 | 2,798,721 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| HSBC NA | 163,070 | 1,260,051 | 15,937 | 12,037 | 3,900 | 8,885 | 3,152 | 0 | 0 | 3,900 | 0 | 0 | 0 |
| U S BANK NATIONAL ASSN | 669,426 | 1,207,356 | 15,509 | 6,474 | 9,035 | 3,331 | 0 | 0 | 3,144 | 161 | 0 | 0 | 8,874 |
| BANK OF NEW YORK MELLON | 357,477 | 1,148,791 | 255 | 255 | 0 | 255 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| PNC BANK NATIONAL ASSN | 561,950 | 682,589 | 12,049 | 4,975 | 7,074 | 100 | 0 | 0 | 4,875 | 0 | 0 | 0 | 7,074 |
| TD BANK NATIONAL ASSN | 369,860 | 401,188 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TRUIST BANK | 526,714 | 396,366 | 9,544 | 3,296 | 6,248 | 325 | 1,592 | 0 | 1,379 | 0 | 0 | 0 | 6,248 |
| CITIZENS BANK NATIONAL ASSN | 220,152 | 312,760 | 2,049 | 0 | 2,049 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2,049 |
| NORTHERN TRUST CO | 155,573 | 299,279 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MORGAN STANLEY BANK NA | 212,723 | 283,462 | 22,674 | 20,732 | 1,942 | 20,202 | 106 | 424 | 0 | 1,902 | 40 | 0 | 0 |
| CAPITAL ONE NATIONAL ASSN | 478,877 | 267,630 | 6,671 | 3,828 | 2,843 | 0 | 0 | 0 | 3,828 | 0 | 0 | 0 | 2,843 |
| FIFTH THIRD BANK NA | 213,681 | 188,511 | 4,616 | 1,133 | 3,483 | 0 | 0 | 0 | 1,133 | 0 | 0 | 0 | 3,483 |
| REGIONS BANK | 153,946 | 173,998 | 5,364 | 1,608 | 3,756 | 0 | 0 | 0 | 1,608 | 0 | 0 | 0 | 3,756 |
| BMO BANK NATIONAL ASSN | 264,643 | 155,302 | 1 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| KEYBANK NATIONAL ASSN | 185,233 | 134,631 | 113 | 18 | 95 | 18 | 0 | 0 | 0 | 2 | 93 | 0 | 0 |
| HUNTINGTON NATIONAL BANK | 192,859 | 102,732 | 4,257 | 2,656 | 1,601 | 346 | 0 | 0 | 2,310 | 0 | 0 | 0 | 1,601 |
| MANUFACTURERS&TRADERS TR CO | 214,668 | 78,625 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| COMERICA BANK | 79,513 | 72,723 | 1,684 | 689 | 995 | 689 | 0 | 0 | 0 | 995 | 0 | 0 | 0 |
| BOKF NATIONAL ASSN | 49,948 | 65,295 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| UBS BANK USA Top 25 commercial banks, SAs & TCs with | 110,525 | 61,397 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| derivatives | \$15,559,556 | \$204,842,982 | \$3,954,454 | \$2,090,423 | \$1,864,031 | \$1,753,045 | \$133,249 | \$154,509 | \$49,620 | \$1,589,472 | \$60,573 | \$160,541 | \$53,445 |
| Other commercial banks, SAs & TCs with derivatives Total all commercial banks, SAs & TCs with | 5,862,117 | 1,248,469 | 44,397 | 31,390 | 13,006 | 2,433 | 0 | 0 | 28,957 | 2,840 | 11 | 0 | 10,155 |
| derivatives Top 25 commercial banks, SAs & TCs with | 21,421,673 | 206,091,451 | 3,998,851 | 2,121,814 | 1,877,037 | 1,755,478 | 133,249 | 154,509 | 78,578 | 1,592,312 | 60,584 | 160,541 | 63,600 |
| derivatives: percentage of total | | | 98.9 | 52.3 | 46.6 | 43.8 | 3.3 | 3.9 | 1.2 | 39.7 | 1.5 | 4.0 | 1.3 |
| Other commercial banks, SAs & TCs with derivatives: percentage of total | | | 1.1 | 0.8 | 0.3 | 0.1 | 0.0 | 0.0 | 0.7 | 0.1 | 0.0 | 0.0 | 0.3 |
| Total all commercial banks, SAs & TCs with derivatives: percentage of total | | | 100.0 | 53.1 | 46.9 | 43.9 | 3.3 | 3.9 | 2.0 | 39.8 | 1.5 | 4.0 | 1.6 |

Note: Credit derivatives have been excluded from the sum of total derivatives here.

Table 25: Derivatives Data Reported by FFIEC 051 Filers*

Commercial Banks, Savings Associations, and Trust Companies in Derivatives, in Millions of Dollars, March 31, 2024

FFIEC 051 Call Report Schedule SU

| Gross notional amount of derivatives | 1Q24 | 4Q23 | 3Q23 | 2Q23 | 1Q23 | 4Q22 | 3Q22 | 2Q22 | 1Q22 | 4Q21 | 3Q21 | 2Q21 |
|---|----------|----------|-----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| Total gross notional amount of interest rate derivatives held for trading | \$5,670 | \$5,586 | \$5,325 | \$5,242 | \$5,016 | \$4,792 | \$4,915 | \$4,953 | \$4,994 | \$5,011 | \$5,301 | \$5,189 |
| Total gross notional amount of all other derivatives held for trading | \$149 | \$149 | \$50 | \$47 | \$51 | \$43 | \$42 | \$35 | \$39 | \$44 | \$14 | \$173 |
| Total gross notional amount of interest rate derivatives not held for trading | \$25,430 | \$26,068 | \$122,763 | \$21,050 | \$17,819 | \$14,395 | \$16,786 | \$19,499 | \$21,308 | \$22,545 | \$29,991 | \$31,949 |
| Total gross notional amount of all other derivatives not held for trading | \$614 | \$614 | \$845 | \$842 | \$676 | \$1,103 | \$1,037 | \$1,142 | \$1,007 | \$1,314 | \$1,461 | \$1,350 |

FFIEC 051 Call Report Schedule RC-R**

| Notional principal amounts of over-the-counter derivative contracts | | | | | | | | | | | | |
|---|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| covered by the regulatory capital rules | 1Q24 | 4Q23 | 3Q23 | 2Q23 | 1Q23 | 4Q22 | 3Q22 | 2Q22 | 1Q22 | 4Q21 | 3Q21 | 2Q21 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Interest rate | Reported | \$20,246 | Reported | \$20,844 | Reported | \$12,839 | Reported | \$14,092 | Reported | \$14,005 | Reported | \$17,688 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Foreign exchange rate | Reported | \$7 | Reported | \$5 | Reported | \$5 | Reported | \$4 | Reported | \$4 | Reported | \$3 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Credit (investment grade reference asset) | Reported | \$75 | Reported | \$80 | Reported | \$188 | Reported | \$265 | Reported | \$230 | Reported | \$196 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Credit (non-investment grade reference asset) | Reported | \$302 | Reported | \$251 | Reported | \$212 | Reported | \$176 | Reported | \$168 | Reported | \$154 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Equity | Reported | \$0 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Precious metals | Reported | \$4 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$4 | Reported | \$1 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Other | Reported | \$0 | Reported | \$1 |

| Notional principal amounts of centrally cleared derivative contracts | | | | | | | | | | | | |
|--|----------|------|----------|------|----------|------|----------|-------|----------|------|----------|-------|
| covered by the regulatory capital rules | 1Q24 | 4Q23 | 3Q23 | 2Q23 | 1Q23 | 4Q22 | 3Q22 | 2Q22 | 1Q22 | 4Q21 | 3Q21 | 2Q21 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | 1 1 |
| Interest rate | Reported | \$69 | Reported | \$90 | Reported | \$79 | Reported | \$108 | Reported | \$21 | Reported | \$193 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Foreign exchange rate | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Credit (investment grade reference asset) | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Credit (non-investment grade reference asset) | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Equity | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Precious metals | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 |
| | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | | Data Not | |
| Other | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 | Reported | \$0 |

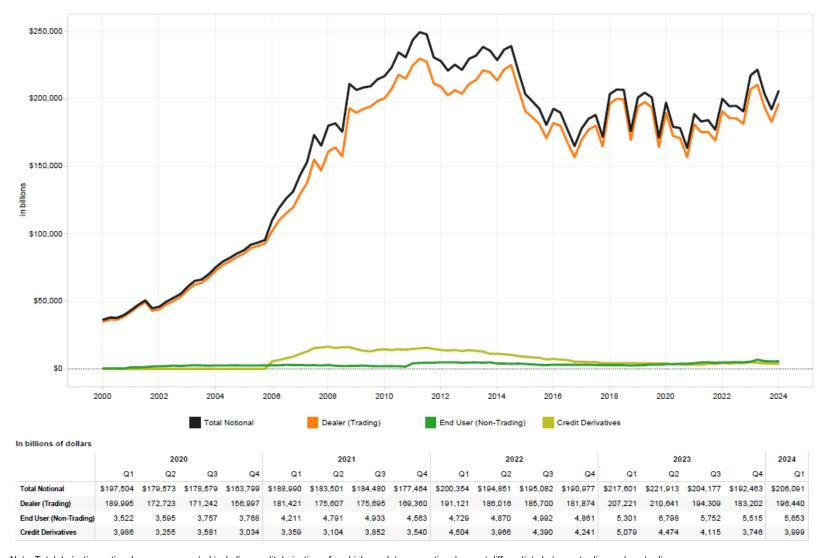
| Current Credit Exposure | 1Q24 | 4Q23 | 3Q23 | 2Q23 | 1Q23 | 4Q22 | 3Q22 | 2Q22 | 1Q22 | 4Q21 | 3Q21 | 2Q21 |
|--|----------|-------|----------|-------|----------|-------|----------|-------|----------|-------|----------|-------|
| Current credit exposure across all derivative contracts covered by the | Data Not | |
| regulatory capital rules | Reported | \$354 | Reported | \$455 | Reported | \$493 | Reported | \$363 | Reported | \$233 | Reported | \$287 |

^{*} Beginning September 30, 2019, the eligibility to file the FFIEC 051 call report expanded from banks with total assets less than \$1 billion to include banks with less than \$5 billion in total assets.

Source: Call reports, Schedule SU and Schedule RC-R

^{**} Beginning September 30, 2019, banks filing the FFIEC 051 call report complete this information from schedule RC-R in the June and December reports only.

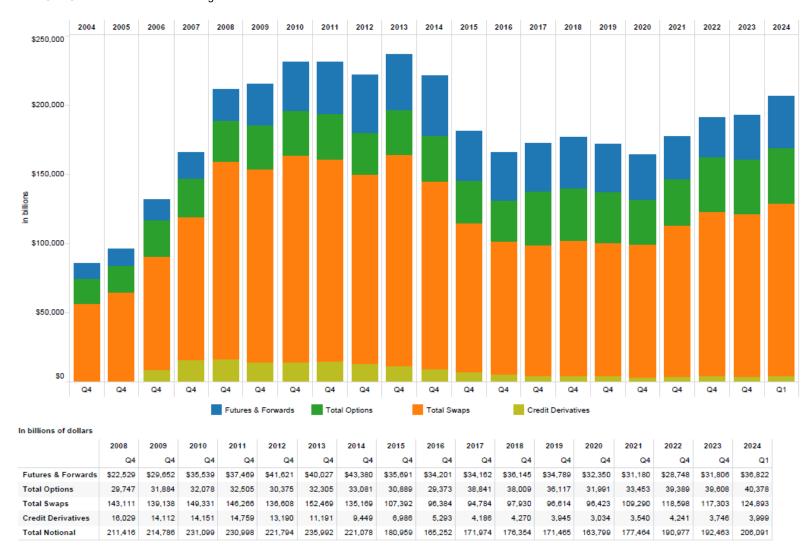
Figure 7: Derivative Notional Amounts by Type Insured U.S. Commercial Banks and Savings Associations



Note: Total derivative notionals are now reported including credit derivatives, for which regulatory reporting does not differentiate between trading and nontrading.

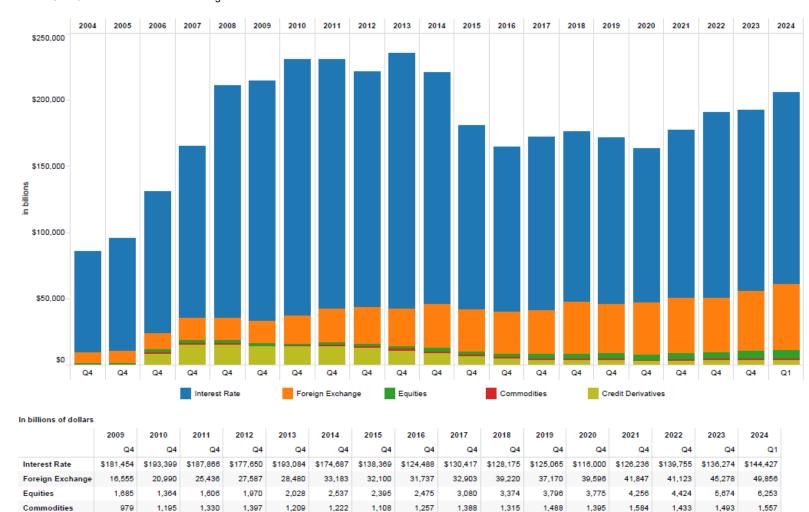
Figure 8: Derivative Contracts by Product*

Insured U.S. Commercial Banks and Savings Associations



^{*} Notional amount of total: futures, exchange-traded options, over-the-counter options, forwards, and swaps.

Figure 9: Derivative Contracts by Type*
Insured U.S. Commercial Banks and Savings Associations



13,190

221,794

14,759

230,998

Note: As of 2006 Q2 equities and commodities are shown as separate categories. They were previously shown as "Other Derivs."

11,191

235,992

9,449

221,078

6,986

180,959

5,293

165,252

4,186

171,974

4,270

176,354

3,945

171,465

3,034

163,799

3,540

177,464

4,241

190,977

3,999

206,091

3,746

192,463

Source: Call reports, Schedule RC-L

Credit Derivatives

Total Notional

14,112

214,786

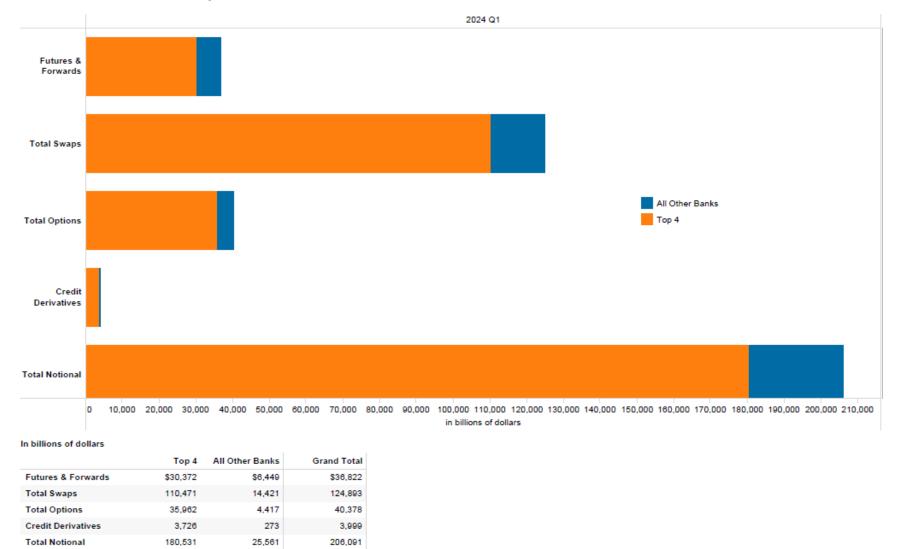
14,151

231,099

^{*} Notional amount of total: futures, exchange-traded options, over-the-counter options, forwards, and swaps.

Figure 10: Four Banks Dominate in Derivatives*

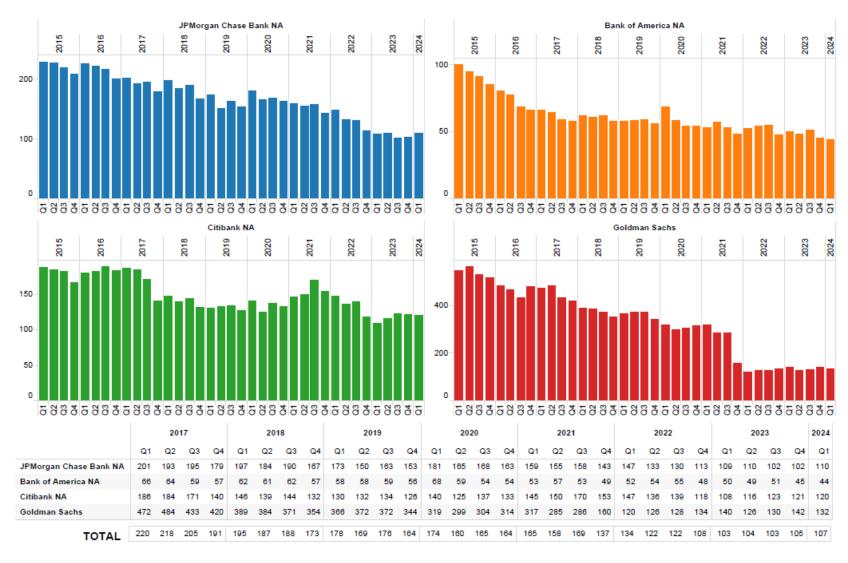
Insured U.S. Commercial Banks and Savings Associations



^{*} Notional amount of total: futures, exchange-traded options, over-the-counter options, forwards, and swaps. See table 13 for a list of the top four banks.

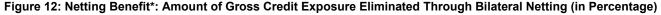
Figure 11: Credit Exposure to Risk-Based Capital (in Percentage)

Top Four Insured U.S. Commercial Banks and Savings Associations by Derivative Holdings

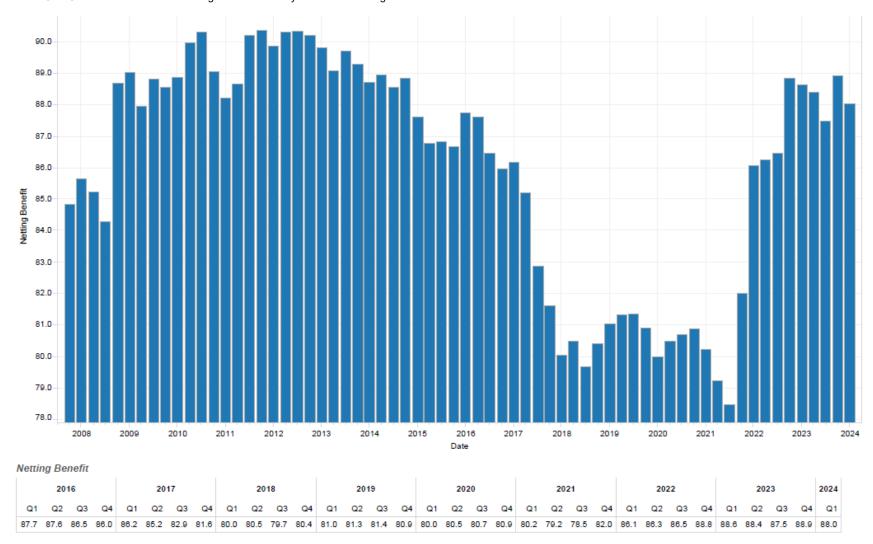


Note: Beginning January 1, 2022, the largest banks are required to calculate their derivative exposure amount for regulatory capital purposes using the Standardized Approach for Counterparty Credit Risk (SA-CCR). Refer to the call report instructions and OCC Bulletin 2020-7, "Standardized Approach for Counterparty Credit Risk: Final Rule," for additional information on the SA-CCR exposure calculation.

Note: The methodology to calculate the ratio of credit risk exposure to capital for the Top 4 category uses a weighted average of total current credit exposure.



Insured U.S. Commercial Banks and Savings Associations by Derivative Holdings



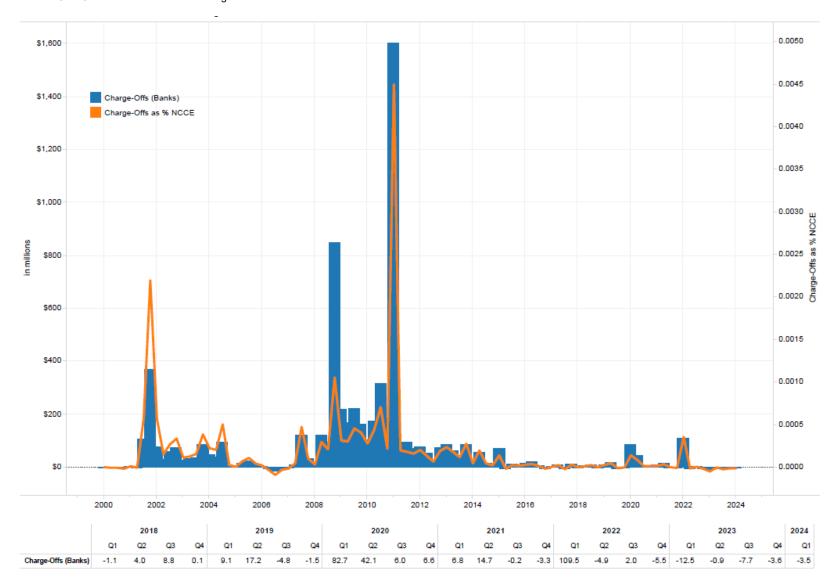
^{*} The netting benefit is defined as the GPFV from call report Schedule RC-L minus the Net Current Credit Exposure from call report Schedule RC-R divided by the GPFV.

Note: Beginning January 1, 2022, the largest banks are required to calculate their derivative exposure amount for regulatory capital purposes using the Standardized Approach for Counterparty Credit Risk (SA-CCR). Refer to the call report instructions and OCC Bulletin 2020-7, "Standardized Approach for Counterparty Credit Risk: Final Rule," for additional information on the SA-CCR exposure calculation.

Source: Call reports, Schedules RC-L and RC-R

Figure 13: Quarterly Charge-Offs/(Recoveries) From Derivatives—Bank

Insured U.S. Commercial Banks and Savings Associations With Derivatives

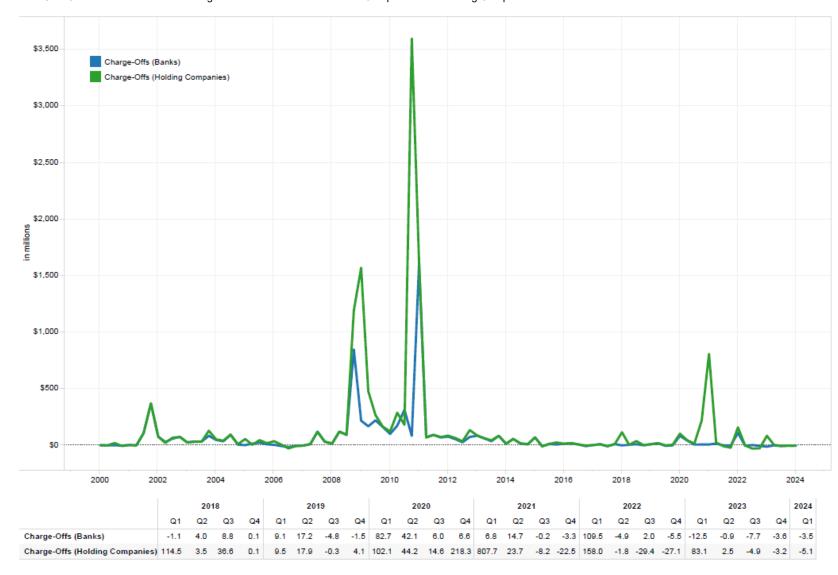


Note: The figures are for each quarter alone, not year-to-date.

Source: Call reports, Schedule RI, NCCE: Pre-2009 Q2 (RC-R); 2009 Q2-2014 Q4 (RC-L); 2015 Q1 onward (RC-R)

Figure 14: Quarterly Charge-Offs/(Recoveries) From Derivatives—Holding Company

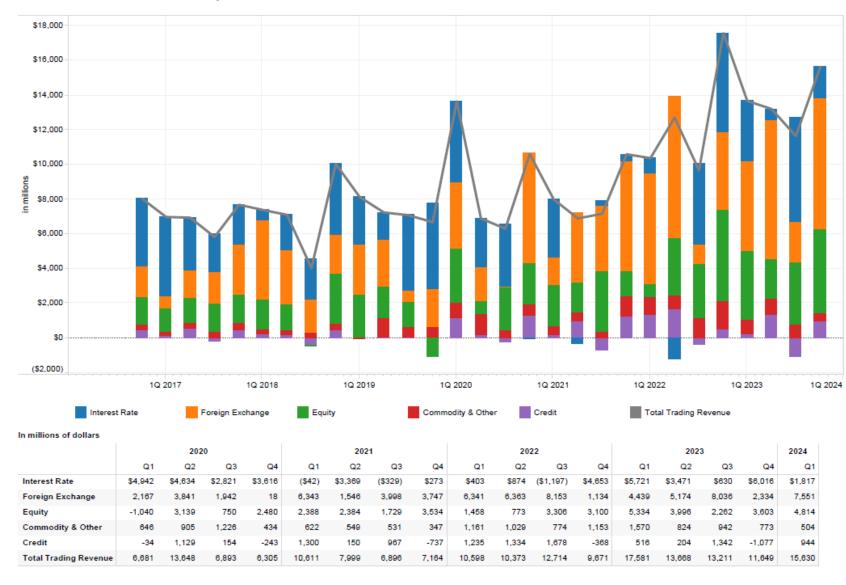
Insured U.S. Commercial Banks and Savings Associations With Derivatives Compared With Holding Companies



Note: The figures are for each quarter alone, not year-to-date.

Source: Call reports, Schedule RI and Y-9, Schedule HI

Figure 15a: Quarterly Trading Revenue (Cash and Derivative Positions)*—Bank



^{*} The trading revenue figures are for cash and derivative activities. Revenue figures are for each quarter alone, not year-to-date.

Source: Call reports, Schedule RI

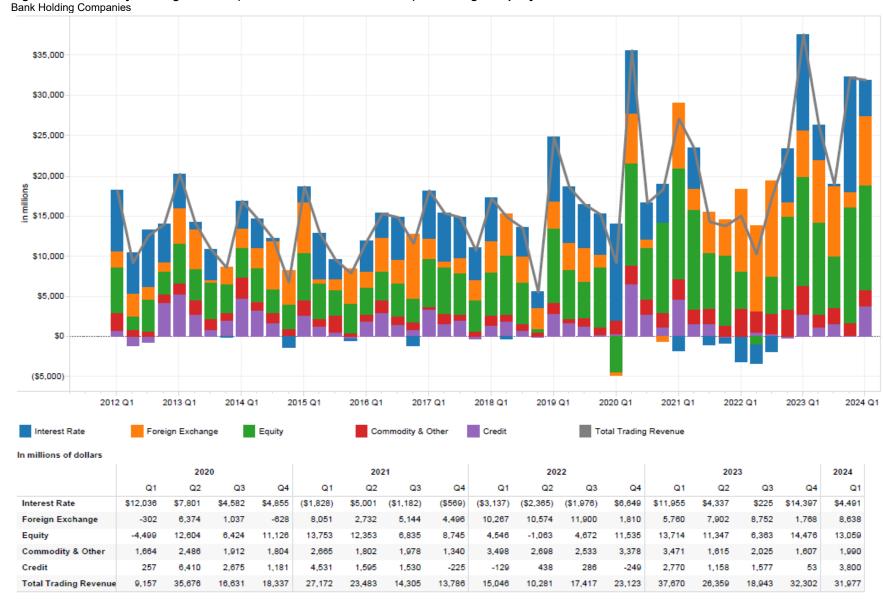
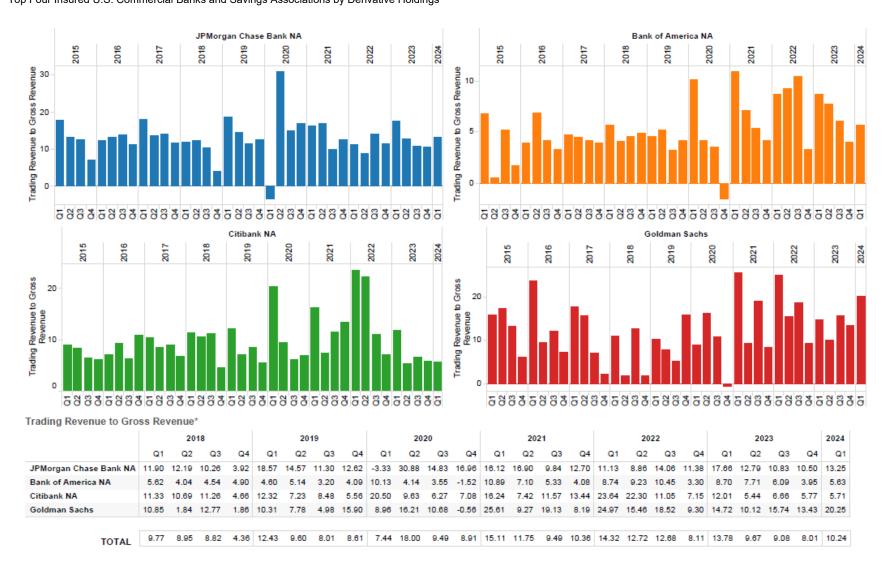


Figure 15b: Quarterly Trading Revenue (Cash and Derivative Positions)*—Holding Company

Source: Y9, Schedule HI

^{*} The trading revenue figures are for cash and derivative activities. Revenue figures are for each quarter alone, not year-to-date.

Figure 16: Quarterly Trading Revenue (Cash and Derivative Positions) as a Percentage of Gross Revenue (in Percentage)*
Top Four Insured U.S. Commercial Banks and Savings Associations by Derivative Holdings

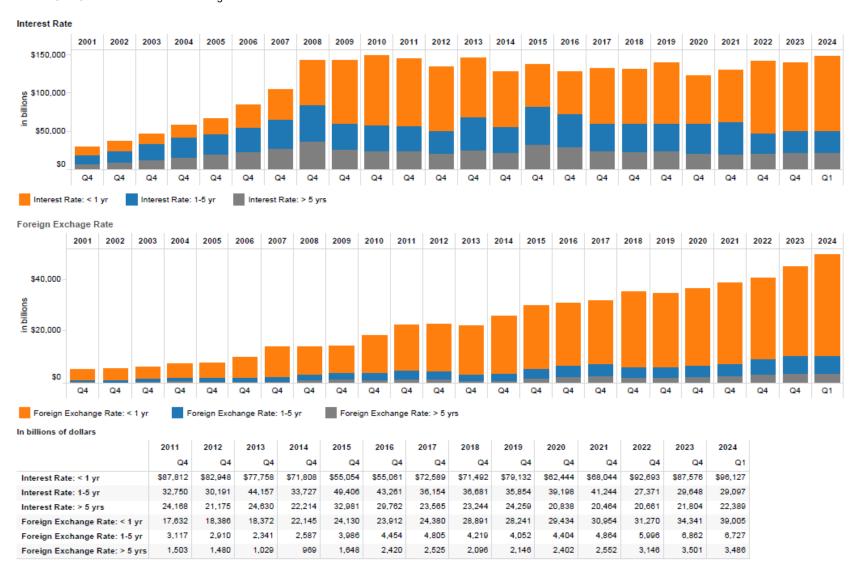


^{*} The trading revenue figures are for cash and derivative activities. Revenue figures are quarterly, not year-to-date numbers.

Note: Gross revenue equals interest income plus non-interest income.

Source: Call reports, Schedule RI

Figure 17: Notional Amounts of Interest Rate and Foreign Exchange Rate Contracts by Maturity



Note: Beginning January 1, 2022, the largest banks are required to calculate their derivative exposure amount for regulatory capital purposes using the Standardized Approach for Counterparty Credit Risk (SA-CCR). Refer to the call report instructions and OCC Bulletin 2020-7, "Standardized Approach for Counterparty Credit Risk: Final Rule," for additional information on the SA-CCR exposure calculation.

Source: Call reports, Schedule RC-R

Figure 18: Notional Amounts of Precious Metal Contracts by Maturity

Precious Metals 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 \$450 \$400 \$350 \$300 \$250 suggested as \$250 suggest \$200 \$150 \$100 \$50-\$0 Q4 Precious Metals: < 1 yr Precious Metals: 1-5 yr Precious Metals: > 5 yrs In billions of dollars 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 Q4 Q1 Q4 Q4 Q4 Q4 Q4 Precious Metals: < 1 yr \$10.72 \$7.55 \$11.55 \$17.47 \$21.12 \$27.68 \$21.41 \$19.29 \$23.51 \$25.07 \$28.62 \$33.62 \$52.58 \$67.80 \$75.78 \$352.12 \$393.20 \$394.80 Precious Metals: 1-5 yr 2.1 1.5 1.2 1.9 4.7 5.8 2.8 3.9 2.5 2.3 2.1 26.0 47.5 43.8 3.8 2.4 2.5 3.5

Note: Beginning January 1, 2022, the largest banks are required to calculate their derivative exposure amount for regulatory capital purposes using the Standardized Approach for Counterparty Credit Risk (SA-CCR). Under SA-CCR gold derivatives are considered precious metals derivative contracts rather than an exchange rate derivative contract, resulting in an increase in reported precious metals derivative contracts compared with prior quarters. Refer to the call report instructions and OCC Bulletin 2020-7, "Standardized Approach for Counterparty Credit Risk: Final Rule," for additional information on the SA-CCR exposure calculation.

0.1

0.0

0.0

0.0

0.0

0.0

0.0

0.0

0.0

0.0

Source: Call reports, Schedule RC-R

Precious Metals: > 5 yrs

0.0

0.0

0.0

0.0

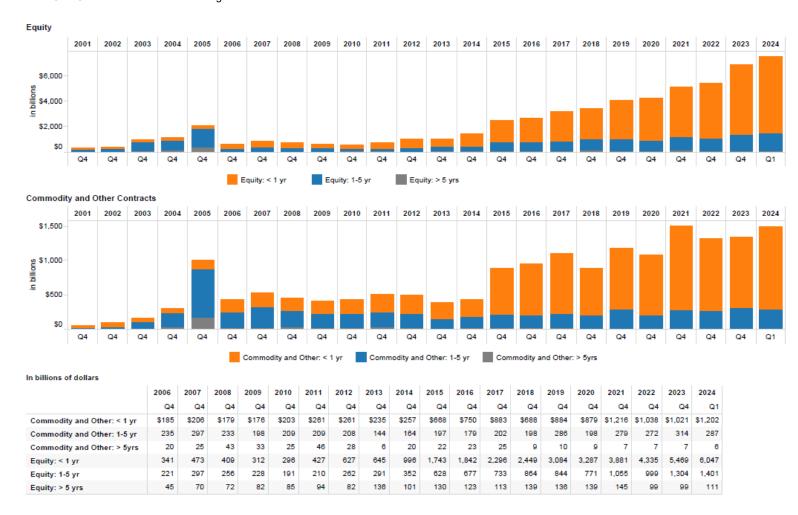
0.1

0.0

0.0

0.3

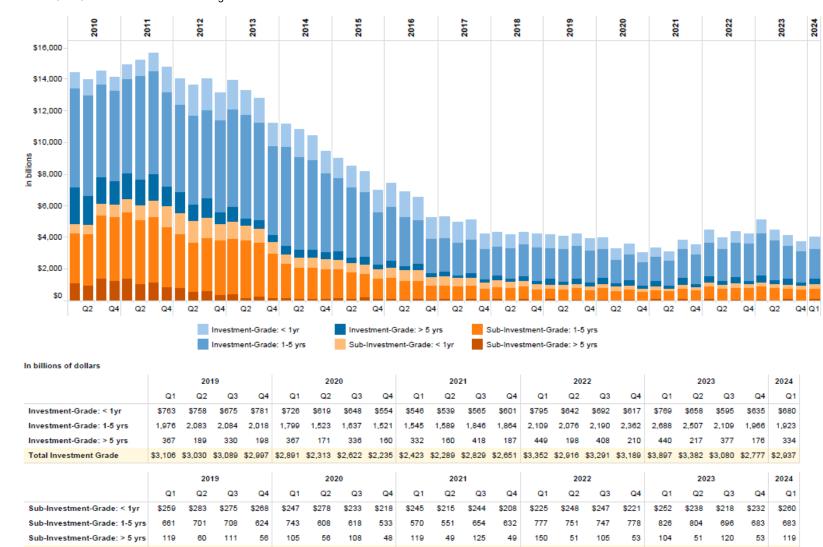
Figure 19: Notional Amounts of Equity Contracts and Commodity and Other Contracts by Maturity



Note: Beginning January 1, 2022, the largest banks are required to calculate their derivative exposure amount for regulatory capital purposes using the Standardized Approach for Counterparty Credit Risk (SA-CCR). Refer to the call report instructions and OCC Bulletin 2020-7, "Standardized Approach for Counterparty Credit Risk: Final Rule," for additional information on the SA-CCR exposure calculation.

Source: Call reports, Schedule RC-R

Figure 20: Notional Amounts of Credit Derivative Contracts by Credit Quality and Maturity



Source: Call reports, Schedule RC-L

Total Sub-Investment Grade

\$1,039 \$1,044 \$1,093

\$947 \$1,095

\$959

\$799

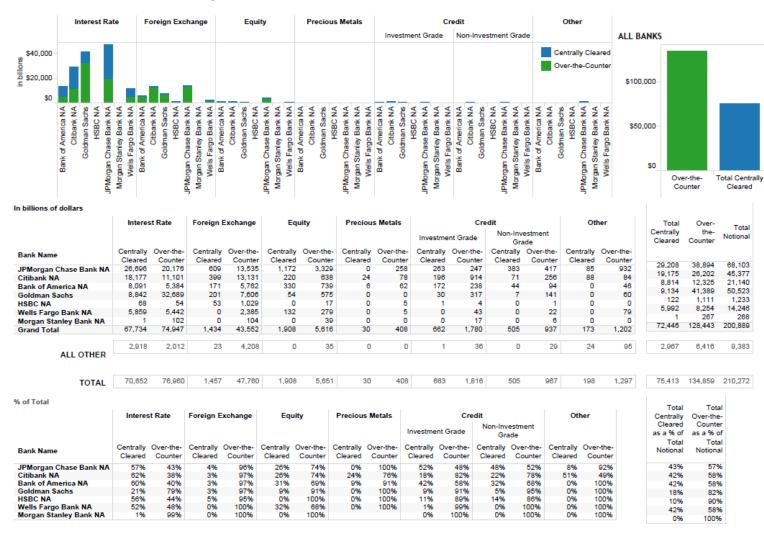
\$935

\$815 \$1,023

\$889 \$1,152 \$1,049 \$1,099 \$1,052 \$1,182 \$1,092 \$1,035

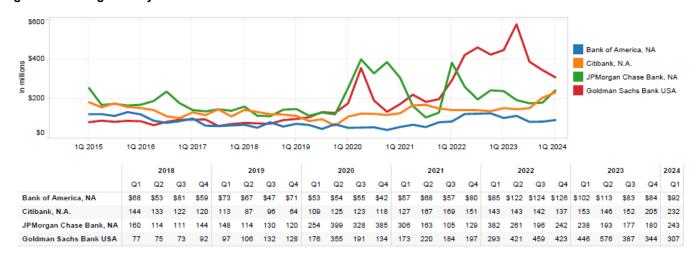
\$968 \$1,061

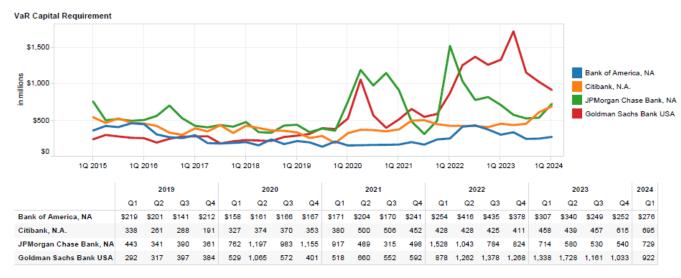
Figure 21: Notional Amounts of Over-the-Counter and Centrally Cleared Derivative Contracts



Source: Call reports, Schedule RC-R

Figure 22: Average 60-Day Value-at-Risk





Source: Market Risk Regulatory Report for Institutions Subject to the Market Risk Capital Rule—FFIEC 102