# Incorporating NAPCS Products in the 2007 Economic Census: Addressing Lessons Learned and Implementing a Coordinated Approach to Improving Economic Data

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**Abstract:** The Census Bureau learned valuable lessons from the initial testing of NAPCS products in the 2002 Economic Census for limited services industries. The more comprehensive implementation of NAPCS products for all service industries in the 2007 Economic Census addresses the lessons learned with improved organizational structure, more formalized review process, and greater internal and external communication and cooperation.

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#### Introduction

The initial testing of NAPCS products in the 2002 Economic Census included new or revised inquiries for over 86 service industries. As the NAPCS development continued, products for substantially all NAICS service industries were available for incorporation into the 2007 Economic Census. The 2002 Economic Census test demonstrated that service products can be collected broadly in large census type surveys. The process also offered some important lessons that, if addressed during implementation, would provide even greater success in future efforts. This paper briefly touches on the lessons learned and provides an overview of the organizational, process, and content adjustments that were made to more efficiently incorporate service products into the Economic Census and to improve the usefulness and usability of Census data for producer price indices and national accounts purposes.

### **Opportunities to Improve Product Data Collection**

The lessons learned in 2002 provide important opportunities to improve the collection and use of service industry product data. While well-defined and recognizable product inquiries did not necessarily reduce response rates, they did increase respondent burden and often resulted in data of low relative importance to the industry totals. Different implementation decisions across programs resulted in data that was not necessarily consistent across Census Bureau programs. Finally, the implementation of NAPCS products in the 2002 Economic Census did not include enough consultation with data users because of limited time between the availability of NAPCS products and the deadline for forms design. In effect, many critical data users did not see the proposed forms until after they were finalized.

These lessons learned pointed out the need for a more comprehensive review of the implementation process. The review addressed the organizational structure in Service Sector Statistics Division (SSSD), the level of detail that would be collected for products in surveys, coordination across census and current survey programs, and brought major data users to the table early in the decision making process. Each of these major improvements is further detailed in the balance of this paper.

### The 2007 Process

SSSD proposed a completely new review process for the implementation of NAPCS products in the 2007 Economic Census. The proposed changes targeted internal cooperation, external consultation, and improvements in the comparability and usefulness of data across programs and organizations in the U.S. statistical system. The entire process was designed to conceptually clarify inquiries and to balance the needs of various programs with the burden the programs place on respondents.

<sup>1</sup> Testing NAPCS Products in the 2002 Economic Census: Successes and Lessons Learned, John Murphy, 20<sup>th</sup> Session of the Voorburg Group, Helsinki, Finland 2005.

Some basic ground rules for product implementation were developed. First, the products would be included, to the extent possible, based on significance rather than the less clear designation of trilateral product status on the NAPCS lists. A target of 2% for detailed products was applied within a larger limit of two pages of product inquiries. This represented the proposed framework for product implementation in Service industries.<sup>2</sup>

Due to the requirements of the GIDS<sup>3</sup> system used for automated forms design in the Economic Census, two levels of product data can be collected. The first level is the broad line and the second level is the detailed line. To ensure that the data was comparable between the Census and the Service Annual Survey (SAS), a general guideline that SAS would collect the broad lines in future annual surveys was implemented. The process for 2007 started with the presentation of new NAPCS product lists to subject matter areas in the Census and Current Survey programs. The NAPCS product lists were discussed with classification and an initial proposal for a 2007 Economic Census survey form was prepared.

The proposed Census questionnaires were next forwarded to BEA and BLS for review and comment. The intention of this process was to harmonize, to the extent possible, the data being collected on output, the price indices that would be used to deflate the output, and to ensure that additional data needed by the national accounts were also addressed. The service industries were broken into six groups, each with a three month schedule from receipt of the NAPCS product list to final content decisions on the Census questionnaires. The final stages of the process are scheduled to end in September, 2005. A more complete discussion of the process is included in Attachment 1.

### **Organizational Structure Changes**

The NAPCS products were developed by interagency teams of subject matter experts working cooperatively with their counterparts in Canada and Mexico. These teams developed the product lists and definitions that were implemented in 2002. The Classification Activities area in SSSD oversaw the process and participated on the NAPCS development teams but was not directly involved with the implementation decisions

The Classification Activities area is responsible for the maintenance and development of classifications in the Census but also is responsible for a number of coding activities for administrative records, pre-census refile surveys, birth coding surveys, and development and maintenance of the coding tools used by clerical staff in the National Processing Center. The Classification area has significant training and oversight responsibilities for ongoing Census Bureau efforts. In order to more clearly delineate the responsibility for

<sup>2</sup> The inclusion of nine pages of detailed inquiries for commercial banking in 2002 highlighted the need for a more reasonable starting point.

<sup>&</sup>lt;sup>3</sup> GIDS – the Generalized Instrument Design System, is used to create templates for Docuprinting, commercial printing, and electronic forms design. The imaging software used in the data capture operations in the National Processing Center requires tight tolerances on the XY coordinates for response areas and formats. The GIDS system provides the required precision and is fundamental to the design and production of questionnaires in the Economic Census.

classification systems development and classification operations, the area was restructured to create two branches.

The Economic Product and Industry Classification Branch was split to form the Economic Classification Development Branch and the Economic Classification Operations Branch in 2003. The development branch was assigned the task of developing and maintaining NAICS and NAPCS and was charged with offering guidance and assistance in the implementation of revisions to the classifications. The operations branch was charged with ongoing surveys and coding activities in support of administrative records and birth surveying. The operations branch is also responsible for adjudicating any classification disagreements that arise across subject matter areas in the Census. This organizational change set the stage for direct classification input into implementation decisions without jeopardizing ongoing operations.

### **Internal Cooperation Improvements**

The initial implementations of products in the 2002 Economic Census and the SAS program on a flow basis for Phase I of NAPCS were undertaken at different times and different decisions were made by each of the programs. This resulted in publication structures that differed for the census and annual surveys.

For the 2007 implementation initiative, the newly formed Economic Classification Development Branch coordinated the review with both the census and annual survey. For those service industries that included products in both programs, a template of proposed detail included both Census and SAS structures. This provided consistency in comparing data across programs but also showed BEA and BLS up front what data was expected to be available in Census years and what data would be available from the annual surveys. While the addition of products in the balance of the SAS has been postponed until after 2008 in order to focus on expanding the industrial coverage of SAS, the agreement that SAS will collect the broad lines identified in the 2007 Census should provide a sound basis for the future expansion of NAPCS products into the annual survey.

### **External Cooperation Improvements**

The most significant external cooperation improvement was the active participation of BEA and BLS in the questionnaire design process. Proposed Census forms had always been circulated for comment but a formal process, with schedules, responsibilities, and written responses had never before been put in place.

The process had several interesting results that were not anticipated. First, various issues were raised as a result of the review process that were only tangentially related to NAPCS product implementation. In several cases, misunderstandings about the data content of past collections were resolved. In other cases, improvements in the special inquiries and expense categories resulted from the close cooperation and review. Overall, data collections will be improved in a variety of ways because of the closer cooperation.

### **Content Improvements on Questionnaires**

The development of a set of practical guidelines for implementation of the NAPCS products on Census questionnaires represented an attempt to analyze the results of the NAPCS working groups within a data collection and respondent burden framework. The initial test in 2002 included all trilateral products and resulted in extremely long and burdensome questionnaires.

The process for including products on 2007 Economic Census forms addressed the mixture of concepts that had previously existed in the item for details of sales, shipments, revenue or receipts and focused that area on products only. Inquiries related to sources of revenue below the product level were moved to special inquiries and information regarding the institutional sector of the customer was addressed more completely in class of customer inquiries.

The choice of detail was based on past collection experience when possible. However, past results were also balanced with more detailed industry knowledge when making decisions. For example, economic conditions were not favorable for mergers and acquisitions in 2002, however the products related to providing mergers and acquisitions services could be substantially more important in 2007. Although size and relative importance were significant decision-making criteria for inclusion of products on the forms, they were by no means the exclusive criteria used.

BEA also requested broad coverage of products across industries. The NAPCS focus on identifying the outputs of units in NAICS industries supported that need. Products were identified on the NAPCS lists regardless of whether or not they were produced by other industries in greater quantities. There was very little focus on primary or secondary; rather the focus was on the products actually produced and reportable by respondents.

Ultimately, content decisions in the absence of collection experience were made based on the best judgment of Census Bureau analysts, the needs of BEA, and the price index collection experience of analysts at BLS. A future review of the results of the product collections in the 2007 Economic Census will hopefully show the strength of this approach.

### 2007 Case Study: Commercial Banking

The case study for commercial banking presented in Testing NAPCS Products in the 2002 Economic Census: Successes and Lessons Learned, provides a practical illustration of the improvements that resulted from the 2007 NAPCS product implementation process improvements. While the final content of the forms was not complete at the time of this paper, the process to date clearly shows the improvements.

In 2002, 168 detailed turnover or revenue questions were asked of commercial banks. Of those, only 28 (17%) represented 1% or more of total industry revenue. The number of

questions related to banking was smaller than the number related to securities products. Although both banking and securities products were significant, the imbalance created substantial respondent burden.

The first step of the internal process was a review of the 2002 results and a separation of product questions from questions related to non-product sources of revenue. The Census Bureau's initial proposal increased the number of banking questions from 27 in 2002 to 31, removed all securities product questions, and reduced the number of special inquiries related to interest, fees, or classes of customer from 104 to 10. These 10 were moved to item 26, Special inquiries to clearly separate them from the product turnover data requested in item 22.

Several rounds of proposals and counter proposals took place and the details of the final content began to take shape. Detailed products were regrouped and re-aggregated to reduce respondent burden but still meet the needs of national accounts. Additional products were added for securities brokering and dealing, finance leasing, operating leasing, and investment advice. Special inquiries were reworked although at the time of this writing, the final decision on the number of special inquiries is not complete. The comparison of the product questions in Table 1 shows the results of the cooperative effort.

Table 1. Product Inquiries				
<b>Product Type</b>	2002	2007		
Banking products	27	21		
Leasing products	1	3		
Financial advice products	2	3		
<b>Securities products</b>	34	5		

As noted, there are still some outstanding questions at the time of this writing regarding the number of special inquiries related to non-product sources of revenue. The Census Bureau wishes to minimize the number of aggregate special inquiries and has proposed 3 aggregates with 8 detailed inquiries. BEA has requested 13 aggregates closely related to the individual products included in item 22 with 37 more detailed inquiries. Table 2 summarizes the results under both scenarios with the 2007 BEA proposal and associated percentage changes included in parenthesis for the 2007 and % reduction columns.

<sup>&</sup>lt;sup>4</sup> The detailed options are provided as Attachment 2.

Table 2. Comparison of 2002 and 2007 Inquiries for Commercial Banking					
Total Inquiries	2002	2007	% reduction		
Products	64	32	50%		
Other	104	8 (37)	94% (65%)		
Total	168	40 (69)	76% (59%)		

The results for commercial banking are not necessarily reflective of the results in other service product areas but do show that a coordinated effort among data users and data providers, though requiring some tradeoffs, can satisfy both sets of needs and still result in reduced respondent burden.

### **Summary**

The lessons learned from the 2002 Economic Census test of NAPCS product implementation provided important lessons learned that are being addressed in the 2007 Economic Census effort. Organizational structures, internal cooperation, external cooperation, and conceptual alignment of inquiries improves the data collection process and can reduce respondent burden without undue loss of critical data. The cooperative interaction of programs in the decentralized U.S. statistical system can overcome some of the limits of that system.

The 2007 NAPCS implementation process will lead to lessons learned as well. Implementation of classifications is an iterative and collaborative process just as is the development and refinement of classifications is an iterative process. The voices of data collectors and data users must be heard in order to produce the most useful and comparable economic statistics across agencies and programs.

### **Attachment 1. Initial Proposal for 2007 Process**

### Proposed Process for Development and Review of Products by Census, BEA, and BLS

#### I. General Schedule of Work

The general guidance for determining the product content of service industry survey forms for the 2007 Economic Census presented a three-month schedule for each of 6 batches of NAPCS product lists. One batch of NAPCS product lists will be delivered each month beginning in January with the final batch of NAPCS lists available in June of 2005.

Each batch of lists will be addressed using a three-month process. Upon receipt of the batches of NAPCS lists, they will be forwarded to the Census subject matter areas, BEA, and BLS. Initially, the Census Bureau will take the first month to develop a proposal for review by BEA and BLS, the second month will be available for BEA and BLS to comment on the Census proposal and resolve any differences, and the third month will be used by Census to finalize the content of the specific 2007 Economic Census survey forms for those areas.

In order to ensure that the process is efficient, both internally and externally, we are proposing a more detailed schedule of activities. The same basic schedule is proposed for each group of products.

Upon receipt of the batch of NAPCS lists, the Census subject matter area will take approximately two weeks to develop an initial proposal for product inclusion on the related Census forms. At the middle of the month, the Census subject matter area will forward the proposal to the Service Annual Survey subject matter area and the Classification area for review. There will be two weeks allotted to review, comment, and resolve any issues and develop a Census proposal. This proposal will be forwarded to BEA and BLS for review and comment. The Classification Area will forward the proposals to BEA and BLS.

We ask that BEA and BLS take the next two weeks to review and comment on the forms back to the Census Bureau and each other. The Classification Area will coordinate comments from BEA and BLS as well as within the Census Bureau. The final two weeks of the second month will be used to resolve any differences in the product proposals.

The third month will be used by the Census Bureau to finalize or formalize the decisions of the three-agency review.

### For the first batch of NAPCS products, this would result in the following schedule:

February 1 – February 14: Census subject matter area prepares first draft proposals

**February 14 – February 28:** SAS and Classification review, comment, and resolve differences so that a Census proposal is ready for presentation to BEA and BLS.

**March 1 – March 15:** BEA and BLS review the Census proposal and submit comments or questions to Census through the Classification Area coordinator.

**March 16 – March 31:** Census reviews comments from BEA and BLS and the coordination area attempts to resolve differences. This could be done by phone, e-mail, or face-to-face meetings depending on the extent of the differences. The content decisions will be made by March 31.

**April 1 – April 30:** Census finalizes the decisions in the forms design process internally.

Each subsequent batch of products would follow the same schedule, shifted by one month, ending with complete product detail for service industries finalized by September 30, 2005.

#### II. Census Plans and Overview

The Census Bureau is planning to collect NAPCS product details in the Economic Census and the Service Annual Survey. The initial testing of a limited number of NAPCS products was performed in the 2002 Economic Census and the following SAS years. Those tests will be evaluated when choosing products for future collection.

The majority of the NAPCS service products will be collected in the 2007 Economic Census. Additional product work for the SAS is on hold until 2008. Between now and 2008, the SAS will focus on expanding their industry coverage rather than product coverage for the existing scope.

## The implementation of service products in our economic programs will follow some general guidelines and goals:

- 1) The focus on data collection for item 22 sales, shipments, receipts, or revenue (or its equivalent in future forms) will be NAPCS products. Currently, item 22 is a mixture of products, sources of revenue, sales by institutional sector, or other basis across industries in the services sector. By shifting to a consistent product approach, there will be changes to current collections. Lost information will be addressed through other sections of the form or special inquiries as possible and needed by major data users.
- 2) The Census plans to have no more than 2 pages of product detail on any particular Census form. The products will be collected in a two-level structure with broad lines and detail lines as has been our practice in the past.
- 3) The choice of products for collection will be based the NAPCS product lists, any known reporting problems, and to a lesser extent, what we have collected in the past.

- 4) Specific decisions will be made based on the industry coverage, amount of trilateral detail at the lowest level, and space available. The NAPCS product lists do not all have trilateral agreement at a comparable level. In some cases, trilateral agreement was obtained at levels below which we expect to collect data. In other cases, trilateral levels are at levels that approximate our existing US national industry detail. Decisions will not follow a rule based on trilateral agreement but ability to produce data that is comparable for the three countries is a primary concern.
- 5) Product selection and aggregation decisions will be based on the NAPCS product lists, their provisional aggregation structures, and aggregation schemes that become available. Our long-term goal is to work toward a comprehensive product publication covering all industries as NAPCS is expanded into other sectors. This long-term goal will guide the decision making to the extent possible. All products will be uniquely numbered and collected across industries as appropriate. If a product is collected across forms or industry, the same number will be used. This will also support our long-term goals. We envision a scenario where PPI and Census reach agreement for coordination of PPI and Census outputs in services, similar to our agreements for manufactured goods. Additionally, as programs move forward and NAPCS expands to include more sectors, we foresee similar agreements. Ultimately, we see a complete industry and product series for the entire economy with comparable PPIs. This will greatly expand the usefulness of both of our programs for business, academia, and governmental statistical users.
- 6) Another requirement is to have the Census broad lines used in future SAS surveys. These aggregated levels in the Census (broad lines) will form the basis for the annual survey collections. There will not be an attempt to harmonize existing SAS product collections but rather SAS will change as needed until a broader product application in SAS begins in 2008.
- 7) We plan to incorporate, to the extent possible, the needs of BEA and BLS in this process. This will include working with pricing concepts, historical collection experience, and aggregation to minimize conflicts while keeping in mind our goal and maintaining the integrity of the NAPCS product lists.
- 8) Conflicts in approach will be decided internally based in the following criteria, in order:
  - a. NAPCS products if a conflict is caused by needs that differ from product concepts or aggregations that would require redefining NAPCS products, the agreed upon NAPCS products will be the deciding factor. The NAPCS products were developed based on input from providers of the services as well as input from all three statistical agencies.
  - b. Other agency/program constraints when various approaches can be accommodated within the NAPCS products, provisional structures, and our long-term goal of an all sectors product publication, priority will be given to the needs of other programs.

# Attachment 2. Draft 2007 Product and Special Inquiries for Commercial Banking Product Inquiries – Item 22

Product Inquiries – Item 22.						
Sources of revenue	Bil.	Mil.	Thou.	Dol.	%	NAPCS
1. Loan Products - Income						
a.Loans to businesses and government						1.1.1.1-3
b.Loans to consumers - secured - residential mortgages loans	3					1.1.1.4.1.1
and home equity loans						1.1.1.4.1.2
c. Loans to consumers - secured - other						1.1.1.4.1.399
d.Loans to consumers - unsecured	_					1.1.1.4.2
e.Sum of lines 1a through 1d						1.1.1
2. Credit Card Products - Income						
a. Credit card cardholder products business and government						1.1.2.1.1.1.1 and 3
<b>b.</b> Credit card cardholder products consumer						1.1.2.1.1.1.2
c. Credit card merchant products						1.1.2.1.1.2
d. Credit card association products						1.1.2.1.2
e.Sum of lines 2a through 2d						1.1.2.1
3. Factoring - Fees						1.1.2.2
4. Leasing Products - Income						
a. Operating leases - motor vehicle leases	_					1.1.2.3.1
b. Operating leases - other except real estate rents						1.1.2.3.1
c.Finance leases						1.1.2.3.2
d.Sum of lines 4a through 4c						1.1.2.3
5. Installment Credit Income						
a. Business sales financing	_				-	1.1.2.4.2.1
b.Consumer sales financing	_					1.1.2.4.2.2
c.Sum of lines 5a through 5b						1.1.2.4
6. All Other Credit Financing Products - Income						1.1.2.9
7. Deposit Account Service Packages						1.5.1.1
8. Separately-Priced Deposit Account Products						1.5.1.2
9. Cash Handling and Management Products			-			1.5.2
10. Document Payment Products						1.5.3
11. Foreign Currency Exchange - Fees						1.5.4
12. Trust Products - Fiduciary Fees						
a. Trust products for businesses and governments	<u> </u>		-			1.6.1.1
b.Personal trust products	_				-	1.6.1.2
c. Other trust products	_				-	1.6.1.3-5
d.Sum of lines 12a through 12c			-			1.6.1
13. Automated Clearinghouse (ACH) Products - Fees						1.6.3
14. Financial Planning and Investment Management Products						
<ul> <li>a. Financial planning and investment management services for businesses and govts</li> </ul>						1.6.4.1
b.Personal financial planning and advice products						1.6.4.2.1
c.Personal investment management products			+			1.6.4.2.2
d.Sum of lines 14a through 14c						1.6.4
15. Trading Debt Instruments on Own Account - Net Gains (Losses)						1.4.1
16. Financing Related to Securities		1	+			
						1.3

18.	Brokering and Dealing Products - equities			1.2.2
19.	Brokering and Dealing Products - derivatives contracts			1.2.3
20.	Brokering and Dealing Investment Company Securities, including mutual funds, closed-end funds, and unit investment trusts funds			1.2.5
21.	Other Products Supporting Financial Services - Fee - Specify			1.6.9
22.	TOTAL			

### Special Inquires – Item 26, Option A

### **Special Inquiries**

A.Loans to businesses and government  Estimate the percentage of this establishment's loan revenue from the following sources.	2007 Whole percent
1.Interest income	of revenue
2.Origination fees 3.Other fees	
4. Total (Sum of lines 1 through 3)	100%

B.Loans to consumers – secured – residential mortgages loans and home equity loans  Estimate the percentage of this establishment's loan revenue from the following sources.	2007 Whole percent of revenue
1.Interest income	
2.Origination fees	
3. Other fees	
4.Total (Sum of lines 1 through 3)	100%

C.Loans to consumers - secured - other  Estimate the percentage of this establishment's loan revenue from the following sources.	2007 Whole percent of revenue
1.Interest income	37.13.13.13.1
2. Origination fees	
3. Other fees	
4. Total (Sum of lines 1 through 3)	100%

D.Loans to consumer – unsecured	2007
Estimate the percentage of this establishment's loan revenue from the following sources.	Whole percent of revenue
1.Interest income	
2.Origination fees	
3. Other fees	
4. Total (Sum of lines 1 through 3)	100%

Credit card cardholder products - businesses and E.government Estimate the percentage of this establishment's credit card products income from the following sources.	2007 Whole percent of revenue
1.Interest income 2.Cardholder fees	
3. Total (Sum of lines 1 through 2)	100%
F.Credit card cardholder products – consumer  Estimate the percentage of this establishment's credit card products income from the following sources.	2007 Whole percent of revenue
1.Interest income	
2. Cardholder fees 3. Total (Sum of lines 1 through 2)	4009/
3. Total (Sum of lines 1 through 2)	100%
G.Leasing products - income - operating leases  Estimate the percentage of this establishment's leasing income from the following sources.	2007 Whole percent of revenue
1.Interest income	
2.Fees - Operating leases - motor vehicle	
3.Fees - Operating leases - other except real estate rents 4.Total (Sum of lines 1 through 3)	100%
4. Total (Guill of lifes I till ough 5)	10076
H.Installment credit income – business sales financing Estimate the percentage of this establishment's installment credit income from the following sources.	2007 Whole percent of revenue
1.Interest income 2.Fees	
3. Total (Sum of lines 1 through 2)	100%
I.Installment credit income - consumer sales financing Estimate the percentage of this establishment's installment credit income from the following sources.	2007 Whole percent of revenue
Estimate the percentage of this establishment's installment credit income from the	Whole percent
Estimate the percentage of this establishment's installment credit income from the following sources.  1.Interest income 2.Fees	Whole percent of revenue
Estimate the percentage of this establishment's installment credit income from the following sources.  1.Interest income	Whole percent
Estimate the percentage of this establishment's installment credit income from the following sources.  1.Interest income 2.Fees 3.Total (Sum of lines 1 through 2)	Whole percent of revenue
Estimate the percentage of this establishment's installment credit income from the following sources.  1.Interest income 2.Fees	Whole percent of revenue
Estimate the percentage of this establishment's installment credit income from the following sources.  1.Interest income 2.Fees 3.Total (Sum of lines 1 through 2)  J.All other credit financing products  Estimate the percentage of this establishment's all other credit financing products	Whole percent of revenue  100%  2007 Whole percent
Estimate the percentage of this establishment's installment credit income from the following sources.  1.Interest income 2.Fees 3.Total (Sum of lines 1 through 2)  J.All other credit financing products  Estimate the percentage of this establishment's all other credit financing products income from the following sources.  1.Interest income	Whole percent of revenue  100%  2007 Whole percent
Estimate the percentage of this establishment's installment credit income from the following sources.  1.Interest income 2.Fees 3.Total (Sum of lines 1 through 2)  J.All other credit financing products  Estimate the percentage of this establishment's all other credit financing products income from the following sources.  1.Interest income 2.Fees	Whole percent of revenue  100%  2007  Whole percent of revenue

Estimate the percentage of this establishment's revenue from brokering and dealing from the following sources.	Whole percent of revenue
1. Fees and commissions	
2. Interest income from trading accounts	
3. Net gains (losses) in trading accounts, excluding interest income	
4. Margin interest	
5. TOTAL (Sum lines 1 through 4)	100%

L.Brokering and dealing products - equities	2007
Estimate the percentage of this establishment's revenue from brokering and dealing from the following sources.	Whole percent of revenue
1. Fees and commissions	
2. Interest income from trading accounts	
3. Net gains (losses) in trading accounts, excluding interest income	
4. Margin interest	
5. TOTAL (Sum lines 1 through 4)	100%

M.Brokering and dealing products – derivative contracts	2007
Estimate the percentage of this establishment's revenue from brokering and dealing from the following sources.	Whole percent of revenue
1. Fees and commissions	
2. Interest income from trading accounts	
3. Net gains (losses) in trading accounts, excluding interest income	
4. Margin interest	
5. TOTAL (Sum lines 1 through 4)	100%

### Special Inquiries, Item 26, Option B

### **Special Inquiries**

A.Loan Income	2007
Estimate the percentage of this establishment's loan revenue from the following sources.	Whole percent of revenue
1. Interest	
2. Origination fees	
3. Other fees	
4. TOTAL (Sum lines 1 through 3)	100%

B.Credit Card Products - Interest Income	2007
Estimate the percentage of this establishment's credit card products income from interest income.	Whole percent of revenue
1. Interest	
2. Cardholder fees	
3. Merchant fees	
4. TOTAL (Sum lines 1 through 3)	100%

C.Miscellaneous Interest and Fees	2007
Estimate the percentage of this establishment's leasing, installment credit, and all other credit financing products income from the following sources.	Whole percent of revenue
1. Interest	
2. Fees	
3. TOTAL (Sum lines 1 through 2)	100%