Goldman Sachs Financial Services Conference 2012

KeyCorp

Strong, Focused and Building Momentum

Beth E. Mooney
Chairman and
Chief Executive Officer

Forward-Looking Statements and Additional Information Disclosure

This presentation contains and we may, from time to time, make forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995, including statements about Key's financial condition, results of operations, earnings outlook, asset quality trends, capital levels and profitability. Forward-looking statements are not historical facts but instead represent only management's current expectations and forecasts regarding future events, many of which, by their nature, are inherently uncertain and outside of Key's control. Forward-looking statements usually can be identified by the use of words such as "goal," "objective," "plan," "expect," "anticipate," "intend," "project," "believe," "estimate" or other words of similar meaning.

Our forward-looking statements are subject to the following principal risks and uncertainties: the economic recovery may face challenges causing its momentum to falter or a further recession; the Dodd-Frank Wall Street Reform and Consumer Protection Act and other reforms will subject us to a variety of new and more stringent legal and regulatory requirements, including increased scrutiny from our regulators; changes in local, regional and international business, economic or political conditions in the regions where we operate or have significant assets; changes in trade, monetary and fiscal policies of various governmental bodies and central banks could affect the economic environment in which we operate; our ability to effectively deal with an economic slowdown or other economic or market difficulty; adverse changes in credit quality trends; our ability to determine accurate values of certain assets and liabilities; adverse behaviors in foreign exchange rates, securities, public debt, and capital markets, including changes in market liquidity and volatility; our ability to anticipate interest rate changes correctly and manage interest rate risk presented through unanticipated changes in our interest rate risk position and/or short- and long-term interest rates; unanticipated changes in our liquidity position, including but not limited to our ability to enter the financial markets to manage and respond to any changes to our liquidity position; adequacy of our risk management program; reduction of the credit ratings assigned to KeyCorp and KeyBank; increased competitive pressure due to industry consolidation; unanticipated adverse affects of acquisitions and dispositions of assets, business units or affiliates; and operational or risk management failures due to technological, cybersecurity threats or other factors.

We provide greater detail regarding some of these factors in our 2011 Form 10-K, including in Item 1A. Risk Factors and in Item 7. Management's Discussion and Analysis of Financial Condition and Results of Operation under the heading "Risk Management," as well as in our subsequent SEC filings, all of which are accessible on our website at www.key.com/ir and on the SEC's website at www.sec.gov.

Key does not undertake any obligation to update the forward-looking statements to reflect the impact of circumstances or events that may arise after the date of the forward-looking statements. Actual results or future events could differ, possibly materially, from those anticipated in forward-looking statements, as well as from historical performance.

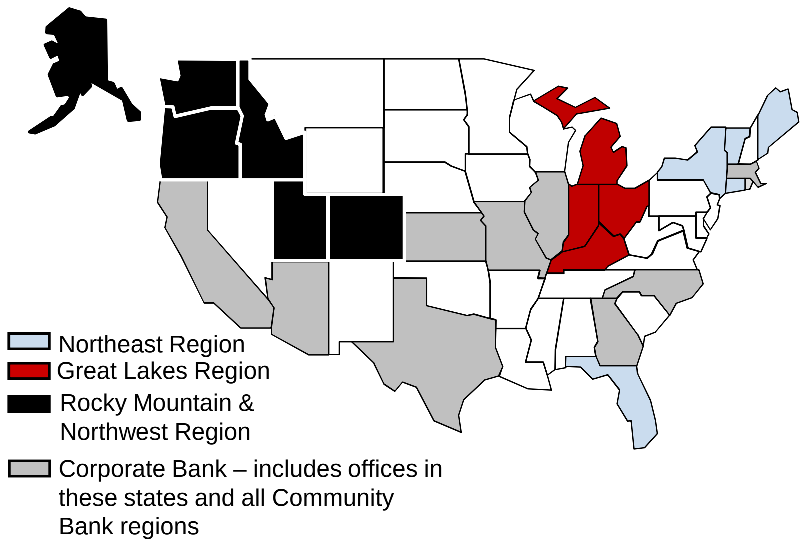
This presentation also includes certain Non-GAAP financial measures related to "tangible common equity, "Tier 1 common equity," "pre-provision net revenue," and "cash efficiency ratio." Management believes these ratios may assist investors, analysts and regulators in analyzing Key's financials. Although Key has procedures in place to ensure that these measures are calculated using the appropriate GAAP or regulatory components, they have limitations as analytical tools and should not be considered in isolation, or as a substitute for analysis of results under GAAP. For more information on these calculations and to view the reconciliations to the most comparable GAAP measures, please refer to the Appendix to this presentation or our most recent earnings press release, which is accessible at www.key.com/ir.

Web addresses referenced in this slide are inactive textual references only. Information on these websites is not part of this document.

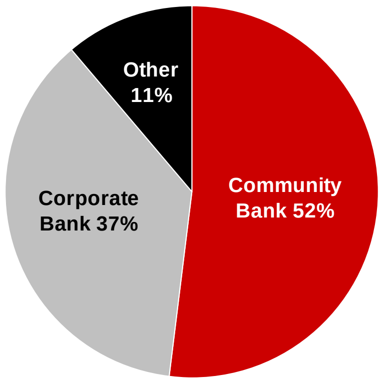
Key – An Overview

Key is a strong company that is well-positioned to leverage its distinctive capabilities

- **15th largest U.S. bank-based financial services company**
- **Assets: $87 billion**
- **Deposits: $64 billion**
- **Market capitalization: $8 billion**
- **Strong footprint with 1,087 branches, over 1,600 ATMs**
- **Approximately 2 million customers**
- **15,833 employees**



3Q12 YTD Revenue



Data as of September 30, 2012
Ranking based on asset size

Balanced, Diverse Franchise

Our footprint provides growth opportunities throughout our franchise — it also balances our risk over the course of the economic cycle

- Business model features local leaders owning their markets to acquire and deepen client relationships across all business segments

Western Markets	Eastern Markets

Western Markets

Expanding presence, high growth potential

- 66 branch denovos or relocations since 2009

Growing, attractive population demographics

- Population and GDP up 16% and 28%, respectively, since 2000, above U.S. averages of 10% and 17%
- Household income +8% vs. U.S. average
- Younger, more highly educated population than U.S. average

Industry opportunities

- Significant opportunities in consumer/retail; healthcare; construction; information/technology

Eastern Markets

Established presence, best density

- 63% of Key's branches

Older population with established wealth

- 600k households with $1MM+ of investable assets within 20-mile radius of Key Private Bank office ➔ $2.5T total wealth
- Deposits per capita +15% vs. U.S. average

Industry opportunities

- Manufacturing, automotive and other export-driven sectors; education; healthcare
- Emergence of unconventional oil & gas shale plays is $12B in annual GDP potential that creates opportunities across Key (e.g., Private Banking; commercial banking; investment banking)[a]

Source: 2010 U.S. Census Bureau data released 9/30/2011 (population, education); U.S. Census Bureau American Community Survey data from 2009 and 2011 (age, household income); Bureau of Economic Analysis June 2012 report (GDP); IXI (household data); Federal Deposit Insurance Corporation data released October 2012 as of June 2012 (deposits); internal Key market data; KeyBanc Capital Markets equity research
(a) KeyBanc Capital Markets equity research

Distinctive, Relationship-Based Business Model

Combines local knowledge and decision making with deep industry expertise and advisory skills

Retail Banking

Private Banking

Investments

Commercial Banking

Community Bank

One Bank
One Team
One Key

Loans & Leases

Deposits

Treasury Management

Corporate Bank

Industry Expertise

Financial Advisory

Capital Markets

Investment Banking

Targeted Industries

Industrial	Healthcare	Energy	Consumer	Real Estate	Public Sector

Strategies for Growth

Industry Challenges

- Slow growth economy
- Low rate environment
- Regulatory change

Key: Refocused and Realigned

- Improved balance sheet mix and risk profile
- Distinctive business model
- Targeted client segments
- Focused on core competencies

Key Focus Areas

- Optimize and Grow Revenue
- Improve Efficiency
- Effectively Manage Capital

Achieve Targets for Success

Targets for Success

Actions have enabled us to make progress on achieving our long-term targets

Key Focus Areas

- Optimize and Grow Revenue
- Improve Efficiency
- Effectively Manage Capital

Business Model	KEY Metrics [a]	Targets	KEY FY10	KEY FY11	KEY 3Q12 YTD	KEY 3Q12
Efficient balance sheet	Loan to deposit ratio [b]	90-100%	90%	87%	86%	86%
Moderate risk profile	NCOs to average loans	40-60 bps	2.91%	1.11%	.77%	.86%
	Provision to average loans		1.18%	(.12)%	.46%	.86%
High quality, diverse revenue	Net interest margin	>3.50%	3.26%	3.16%	3.15%	3.23%
	Noninterest income to total revenue	>40%	44%	44%	47%	48%
Positive operating leverage	Efficiency ratio [c]	60-65%	67%	68%	67%	65%
Strategy execution	Return on average assets	1.00-1.25%	.66%	1.17%	1.08%	1.08%

(a) Continuing operations, unless otherwise noted
(b) Represents period-end consolidated total loans and loans held for sale (excluding education loans in the securitization trusts) divided by period-end consolidated total deposits (excluding deposits in foreign office)
(c) Cash efficiency; excludes intangible asset amortization

Investing for Growth

Optimize and Grow Revenue

Identifying specific growth opportunities across our franchise

	Payments	Franchise	Technology
Opportunity	• Provide bundled solutions that create value across business segments • Leverage strong service culture to expand existing and drive new client relationships	• Optimize network and channels to maximize client, franchise and shareholder value • Enhance and leverage business alignment	• Drive technology enhancements that promote efficiency and effectiveness • Advance technological capabilities in support of business and compliance needs
Strategic Actions	• Acquired Key-branded credit card portfolio • Beginning self-issuance of cards • Executing new merchant services arrangement • Enhancing client information and reporting	• Acquired western NY branches • Rationalizing branch network • Selectively investing in priority markets and industry segments • Coordinating Healthcare focus across Key to expand presence with facilities-based providers	• Investing in online and mobile capabilities • Enhancing sales and service tools • Maintaining image-enabled infrastructure to support efficiency and client preferences • Developing efficient solutions to comply with new regulations

Acquisitions Strengthen Business

Western NY Branch Acquisition

- Smooth conversion
  - On-time execution of client communications, branch readiness and systems conversion
- High client retention
- Positive client feedback
- "Buddy program" utilized to effectively onboard new employees
  - Sales force well-aligned and leveraging Key business model
  - Partnerships formed across segments
- Successful model for future conversions

Key-branded Credit Card Portfolio Purchase

- Capturing attractive client economics
- High quality portfolio
  - Net charge-offs below industry benchmark [(a)]
- Positive client conversion
- "High client touch" product
  - Strengthens relationships and provides cross-sell opportunities
- Beginning process of self-issuance
- Owning and controlling more of the client experience

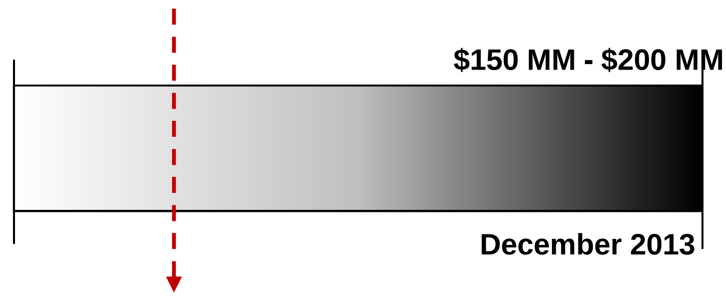
(a) Federal Reserve charge-off rates for consumer credit cards at the 100 largest banks as determined by consolidated asset size

Improve Efficiency

Progress with Efficiency Initiatives

Progress	Goal

- Distribution efficiencies
  - Branch rationalization
  - District consolidation
  - Streamlining of sales support
- Back office re-engineering
  - Strategic sourcing
  - KEF consolidation
  - Process re-design
- Spend management
  - Vendor consolidation and management
  - Demand management



- On track to realize $30 million to $50 million in expense reductions by year-end 2012
- Full benefit of $150 million to $200 million in reductions to be realized in 2014

Fulfilling client needs and delivering solutions in the most efficient way

Leveraging Strong Capital

Effectively Manage Capital

Disciplined capital management drives shareholder value

Organic Growth

Investing in franchise

Dividends

Maintained quarterly cash dividend of $.05 per common share for 3Q12

Share Repurchases

Repurchased $167 million of common shares YTD

Remaining authority of up to $177 million [(a)]

Redemption of TruPS

Redeemed $707 million in 3Q12

Opportunistic Growth

Acquisition of 37 branches in western NY

Acquired credit card portfolio; self-issuance

Maximizing Shareholder Value

(a) Includes general repurchase and repurchase in connection with employee elections under compensation and benefit programs; data as of September 30, 2012

Delivering Shareholder Value

Optimize and Grow Revenue

Improve Efficiency

Effectively Manage Capital

Efficient Balance Sheet

Moderate Risk Profile

High Quality, Diverse Revenue

Positive Operating Leverage

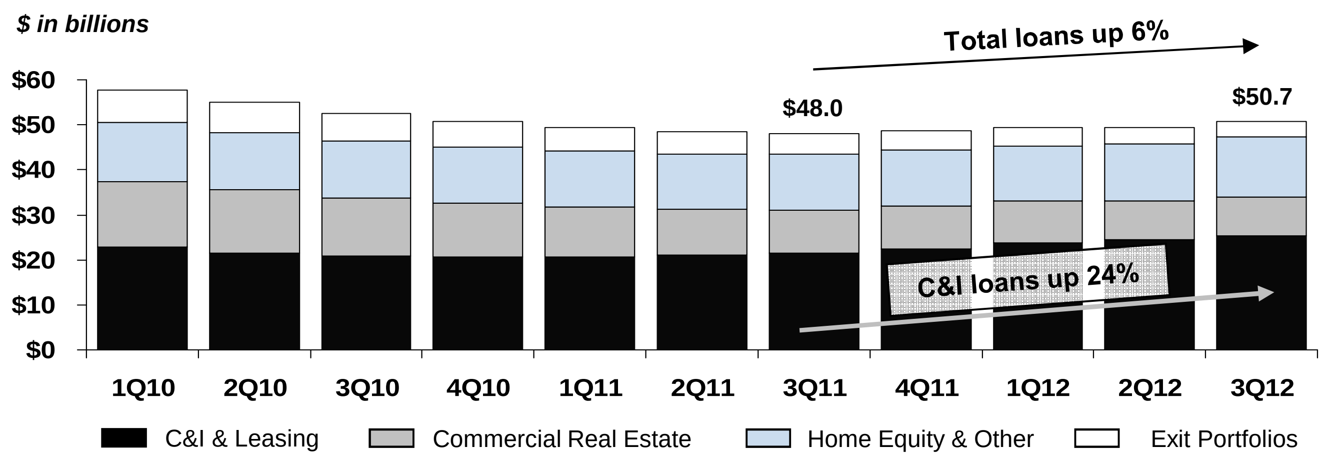
Strategy Execution

Achieve Targets for Success

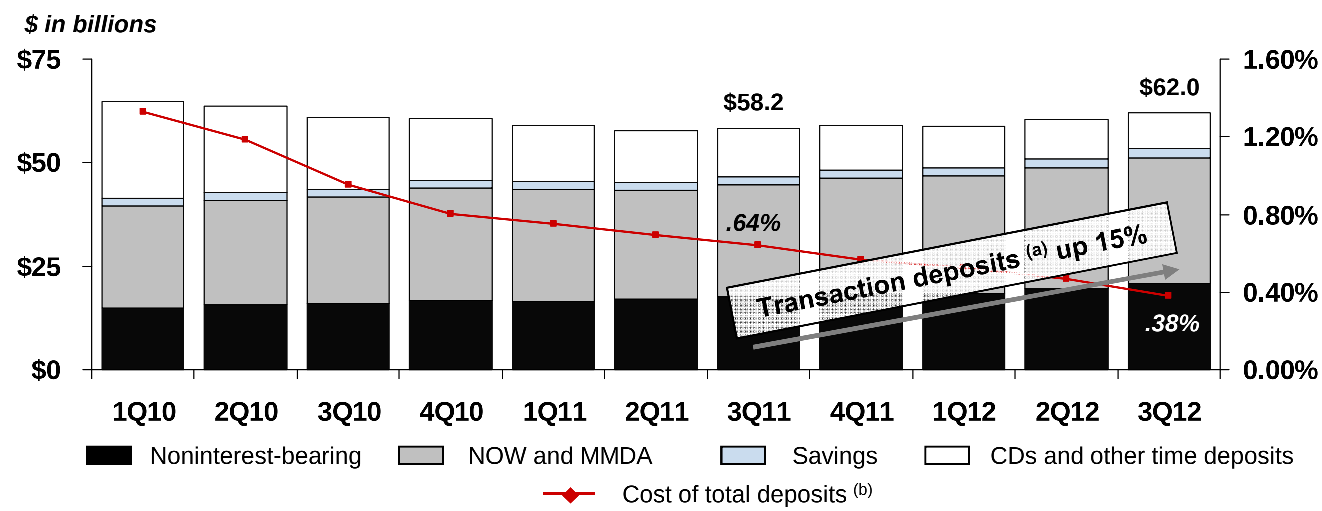
Appendix

Improving Balance Sheet Mix

Loans Continue to Increase, Driven by C&I Loans



Growth in Non-time Deposits with Improved Funding Cost



Note: Loan and deposit figures represent average balances

(a) Transaction deposits include noninterest-bearing, NOW and MMDA

(b) Excludes deposits in foreign office

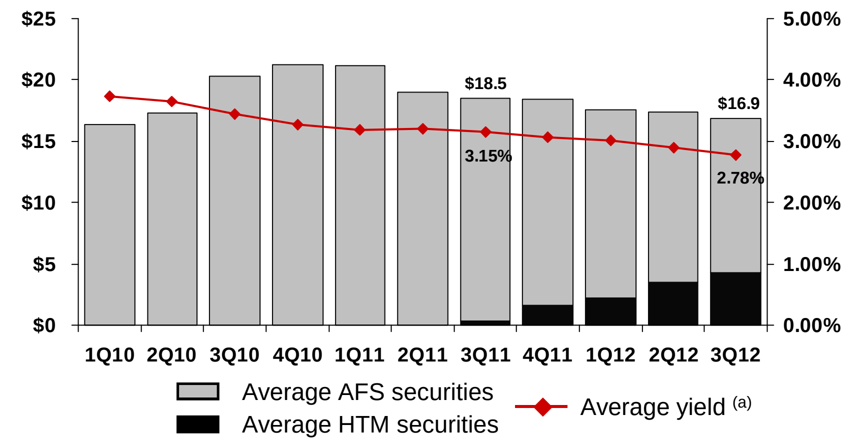
High Quality Investment Portfolio

Highlights

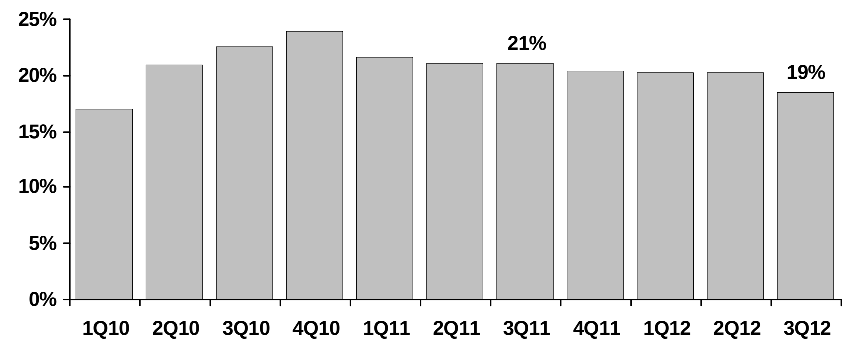
- Portfolio composed of Agency or GSE backed: GNMA, Fannie & Freddie
  - No private label MBS or financial paper
- Average portfolio life at 9/30/12: 2.3 years
- Unrealized net gain of $393 million on available-for-sale securities portfolio at 9/30/12
- Mortgage paydowns of $1.6 billion in 3Q12 and $1.5 billion in 2Q12
- Investment securities declined as paydowns were reinvested for loan growth and acquired assets

Average Total Investment Securities

$ in billions



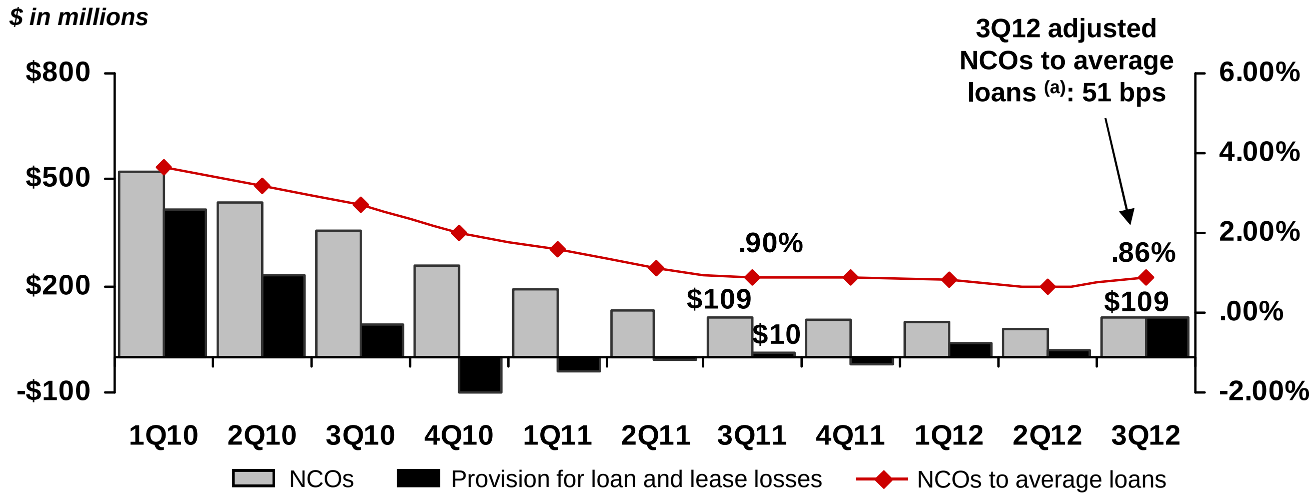
Securities to Total Assets [b]



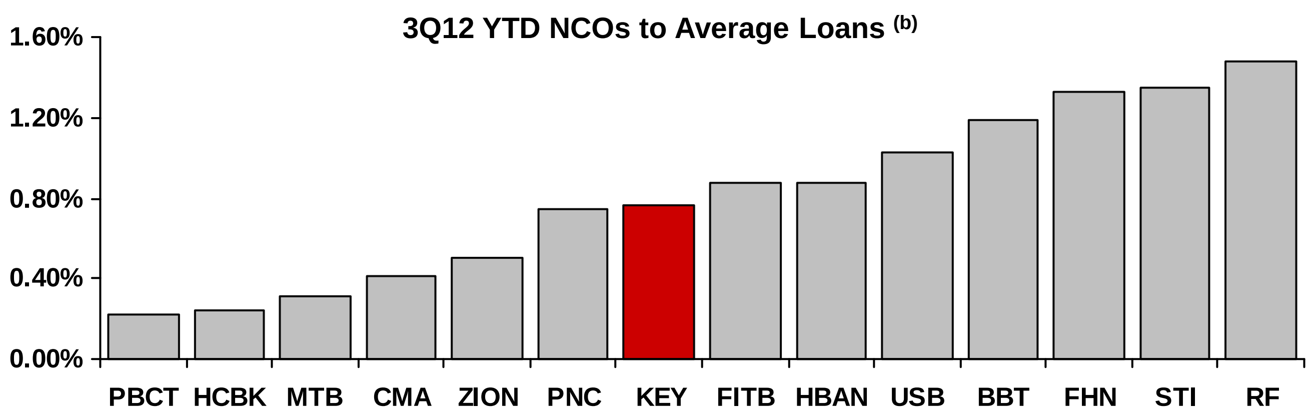
(a) Yield is calculated on the basis of amortized cost
(b) Includes end of period held-to-maturity and available-for-sale securities

Strong Credit Quality

Significant Improvement in Credit Quality Trends



Maintaining Moderate Risk Profile



(a) Excludes impact of updated regulatory guidance on consumer loans
(b) Peer group data source: SNL

Credit Quality

Credit Quality by Portfolio

$ in millions

	Period-end loans	Average loans	Net loan charge-offs		Net loan charge-offs [b] / average loans		Nonperforming loans		Ending allowance [c]	Allowance / period-end loans [c]	Allowance / NPLs
	9/30/12	3Q12	3Q12	2Q12	3Q12	2Q12	9/30/12	6/30/12	9/30/12	9/30/12	9/30/12
Commercial, financial and agricultural [a]	$21,979	$21,473	$7	$3	*.13 %*	*.06 %*	$132	$141	$318	*1.45 %*	*240.91 %*
Commercial real estate:											
Commercial mortgage	7,529	7,463	21	9	*1.12*	*.48*	134	172	221	*2.94*	*164.93*
Construction	1,067	1,116	2	4	*.71*	*1.32*	53	68	48	*4.50*	*90.57*
Commercial lease financing	4,960	5,026	(8)	10	*(.63)*	*.77*	18	18	66	*1.33*	*366.67*
Real estate - residential mortgage	2,138	2,092	6	6	*1.14*	*1.21*	83	78	25	*1.17*	*30.12*
Home equity:											
Key Community Bank	9,768	9,734	62	21	*2.53*	*.90*	171	141	89	*.91*	*52.05*
Other	409	468	5	7	*4.25*	*5.71*	18	17	24	*5.87*	*133.33*
Consumer other— Key Community Bank	1,313	1,297	7	8	*2.15*	*2.58*	3	2	32	*2.44*	*N/M*
Credit cards	710	432	2	-	*1.84*	*N/M*	8	-	25	*3.52*	*312.50*
Consumer other:											
Marine	1,448	1,493	6	7	*1.60*	*1.77*	31	19	36	*2.49*	*116.13*
Other	98	101	(1)	2	*(3.94)*	*7.96*	2	1	4	*4.08*	*200.00*
Continuing total	**$51,419**	**$50,695**	**$109**	**$77**	***.86 %***	***.63 %***	**$653**	**$657**	**$888**	***1.73 %***	***135.99 %***
Discontinued operations - education lending business	5,328	5,403	12	12	*1.67*	*1.64*	22	18	66	*2.34*	*300.00*
Consolidated total	**$56,747**	**$56,098**	**$121**	**$89**	***.90 %***	***.68 %***	**$675**	**$675**	**$954**	***1.76 %***	***141.33 %***

N/M = Not Meaningful

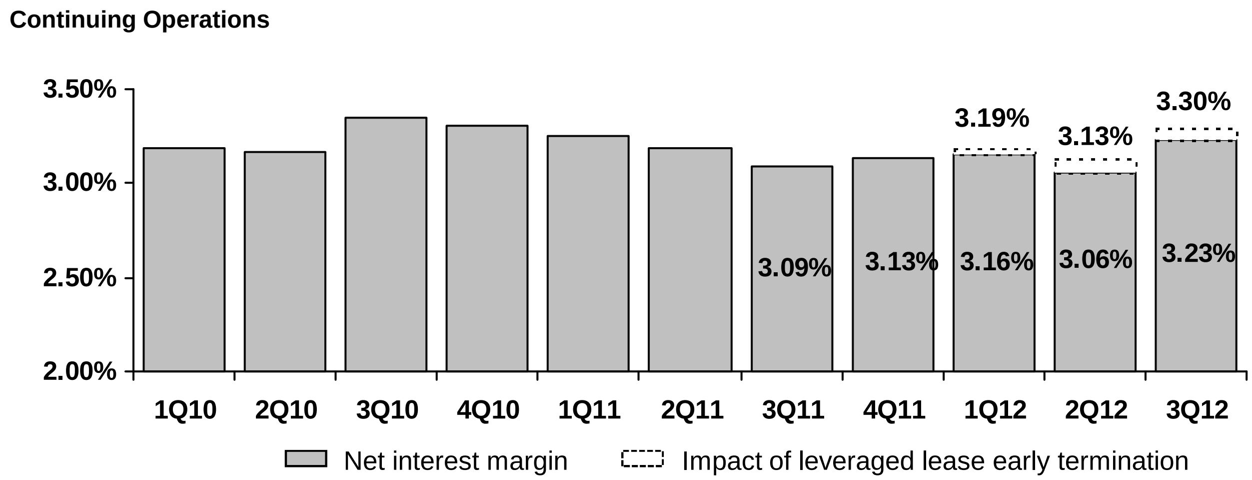
(a) Ending and average loans for third quarter 2012 include commercial credit card balances of $88 million and $54 million, respectively

(b) Net loan charge-off amounts are annualized in calculation. NCO ratios for discontinued operations and consolidated Key exclude education loans in the securitization trusts since valued at fair-market value

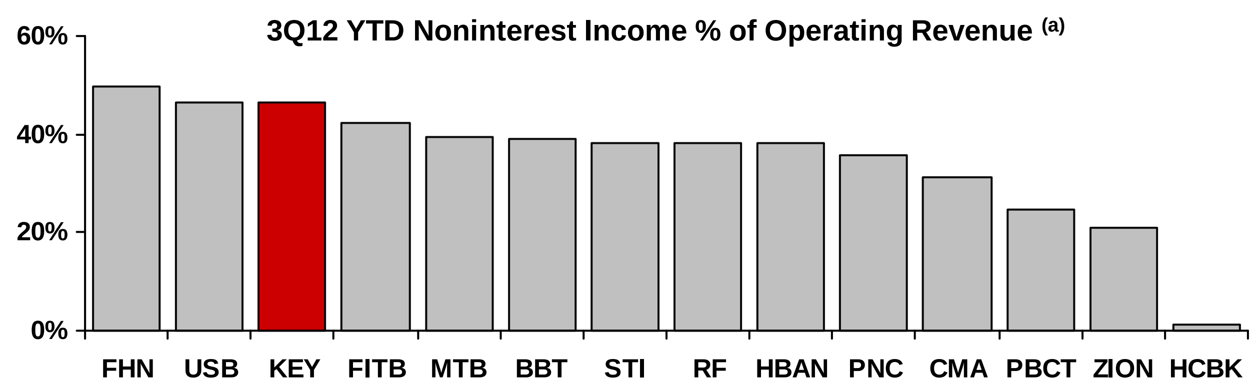
(c) 9-30-12 allowance by portfolio is estimated. Allowance/period loans ratios for discontinued operations and consolidated Key exclude education loans in the securitization trusts since valued at fair-market value

Growing Diverse Revenue Streams

Net Interest Margin (TE) Trend



Expanding Relationships and Driving Fee-Based Businesses

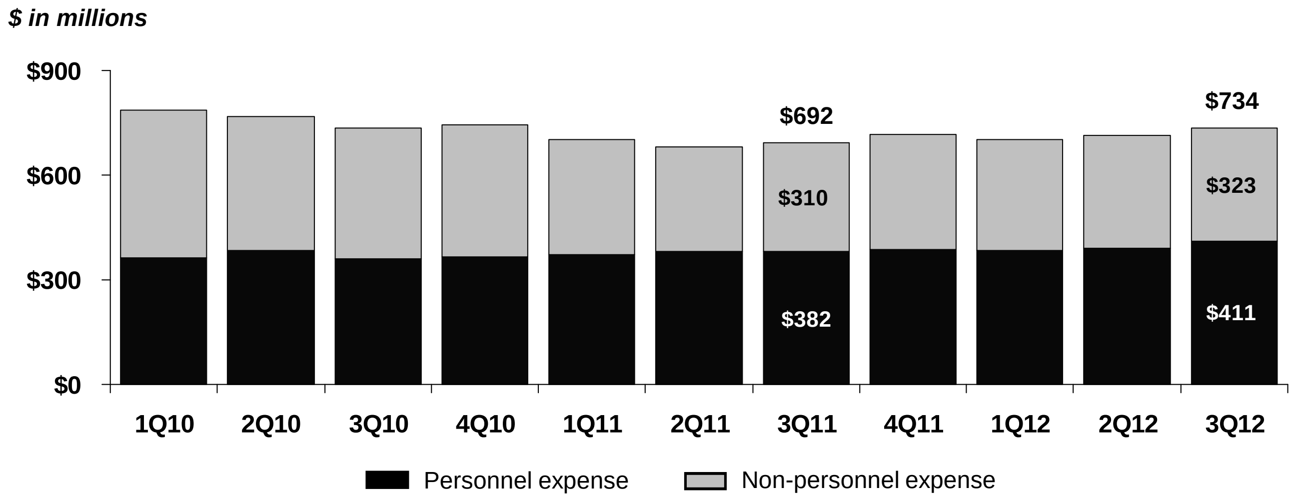


TE = Taxable equivalent

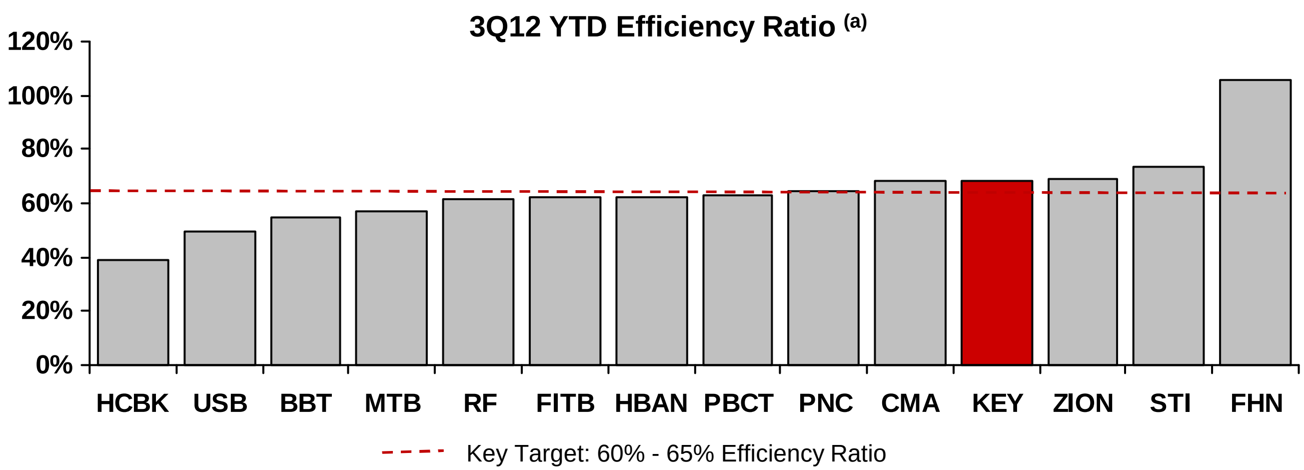
(a) Peer group data source: SNL

Driving Positive Operating Leverage

Maintaining Disciplined Expense Control; Balancing Efficiencies with Investments



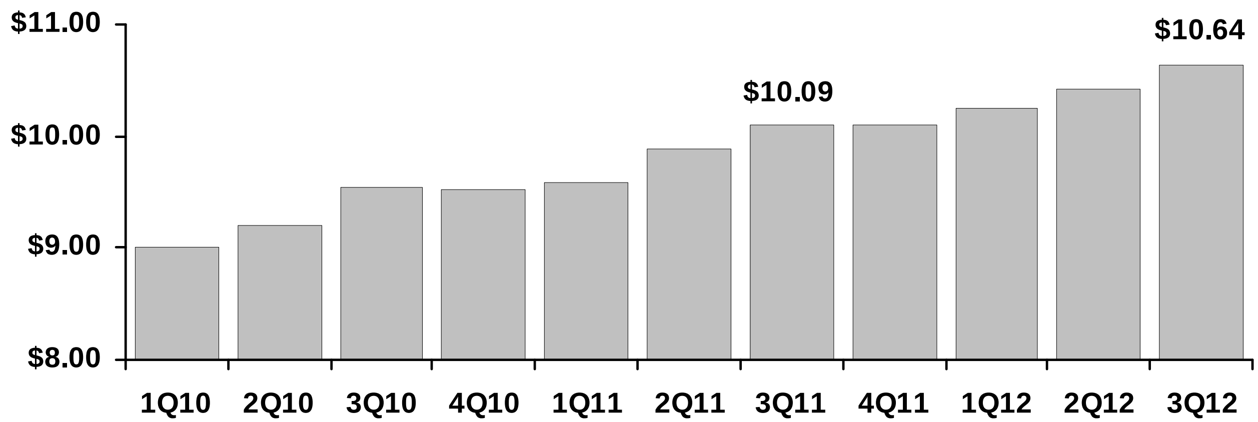
Initiatives in Progress to Improve Efficiency



(a) Peer group data source: SNL

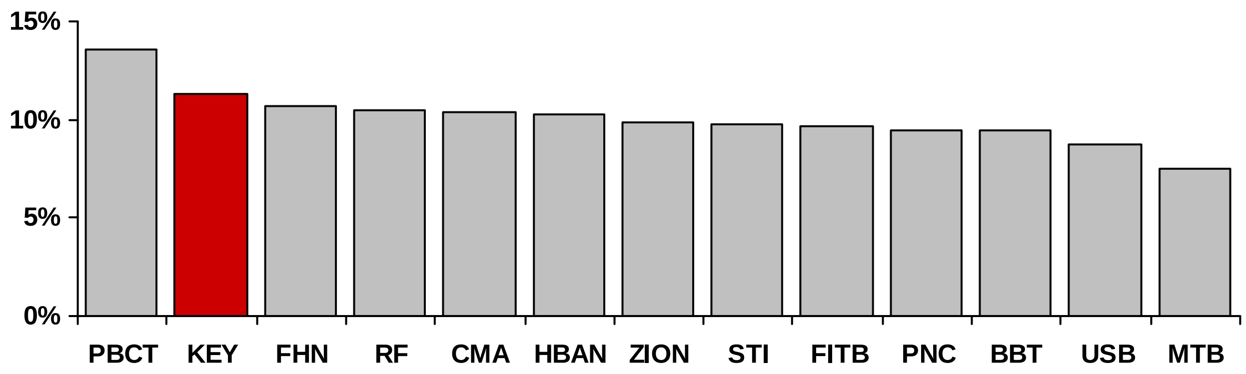
Disciplined Capital Management

Book Value Continues to Grow



Strong Capital Position is a Competitive Advantage Over Time

9/30/12 Tier 1 Common Equity [(a)]



(a) Peer group data source: SNL

Home Equity Loans – 9/30/12

Community Bank – Home Equity

$ in millions, except average loan size

		Loan Balances		Average Loan Size ($)	Average FICO	Average LTV(a)	% of Loans LTV>90%	Vintage (% of Loans) 2011 and later	2010	2009	2008	2007 and prior
Home equity loans and lines												
First lien	$	5,293	$	62,873	757	66 %	.6 %	29 %	6 %	7 %	9 %	49 %
Second lien		4,475		46,561	755	75	3.0	19	5	6	16	54
Total home equity loans and lines	$	9,768	$	54,177	756	71	1.8	25	6	6	12	51
Nonaccrual loans												
First lien	$	89	$	55,358	715	72 %	1.1 %	2 %	3 %	6 %	4 %	85 %
Second lien		82		36,397	709	79	2.9	1	1	3	16	79
Total home equity nonaccrual loans	$	171	$	44,338	712	75	1.9	2	2	5	9	82
Community Bank - Home Equity												
Third quarter net charge-offs	$	62						1 %	1 %	2 %	21 %	75 %
Net loan charge-offs to average loans		2.53 %										

Exit Portfolio – Home Equity

$ in millions, except average loan size

		Loan Balances		Average Loan Size ($)	Average FICO	Average LTV(a)	% of Loans LTV>90%	Vintage (% of Loans) 2011 and later	2010	2009	2008	2007 and prior
Home equity loans and lines												
First lien	$	18	$	22,571	745	34 %	.4 %	-	-	2 %	1 %	97 %
Second lien		391		23,782	730	82	32.3	-	-	-	2	98
Total home equity loans and lines	$	409	$	23,725	731	80	30.8	-	-	-	2	98
Nonaccrual loans												
First lien	$	1	$	19,932	729	37 %	3 %	-	-	-	-	100 %
Second lien		17		19,259	704	83	36.1	-	-	-	2 %	98
Total home equity nonaccrual loans	$	18	$	19,288	705	82	34.7	-	-	-	2	98
Exit Portfolio - Home Equity												
Third quarter net charge-offs	$	5						-	-	-	1 %	99 %
Net loan charge-offs to average loans		4.25 %										

(a) Average LTVs are at origination. Current average LTVs for Community Bank total home equity loans and lines is approximately 79%, which compares to 79% at the end of the second quarter 2012.

Exit Loan Portfolio

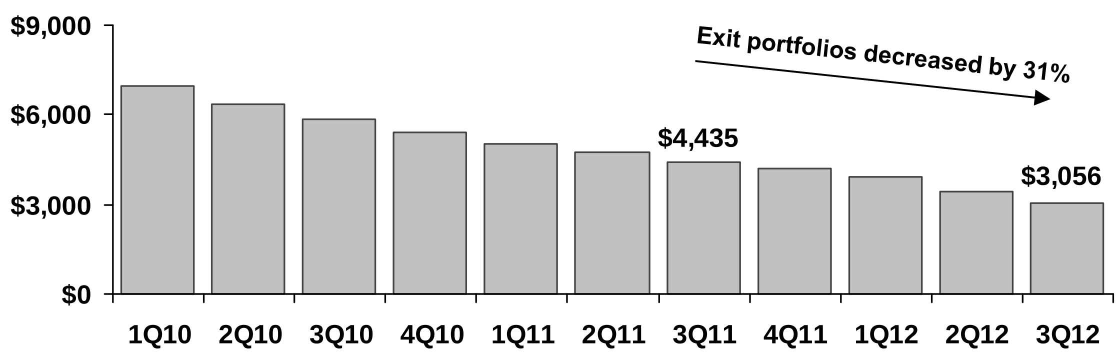
Exit Loan Portfolio

$ in millions

	Balance Outstanding		Change 9-30-12 vs.	Net Loan Charge-offs		Balance on Nonperforming Status	
	9-30-12	6-30-12	6-30-12	3Q12[(c)]	2Q12	9-30-12	6-30-12
Residential properties – homebuilder	$31	$33	$(2)	-	-	$6	$14
Marine and RV floor plan	35	39	(4)	$(1)	$2	12	15
Commercial lease financing [(a)]	1,035	1,237	(202)	(3)	1	8	9
Total commercial loans	1,101	1,309	(208)	(4)	3	26	38
Home equity – Other	409	479	(70)	5	7	18	17
Marine	1,448	1,542	(94)	6	7	31	19
RV and other consumer	98	101	(3)	(1)	2	2	1
Total consumer loans	1,955	2,122	(167)	10	16	51	37
Total exit loans in loan portfolio	$3,056	$3,431	$(375)	$6	$19	$77	$75
Discontinued operations - education lending business (not included in exit loans above) [(b)]	$5,328	$5,483	$(155)	$12	$12	$22	$18

Exit Loan Portfolio Trend (Excluding Discontinued Operations)

$ in millions



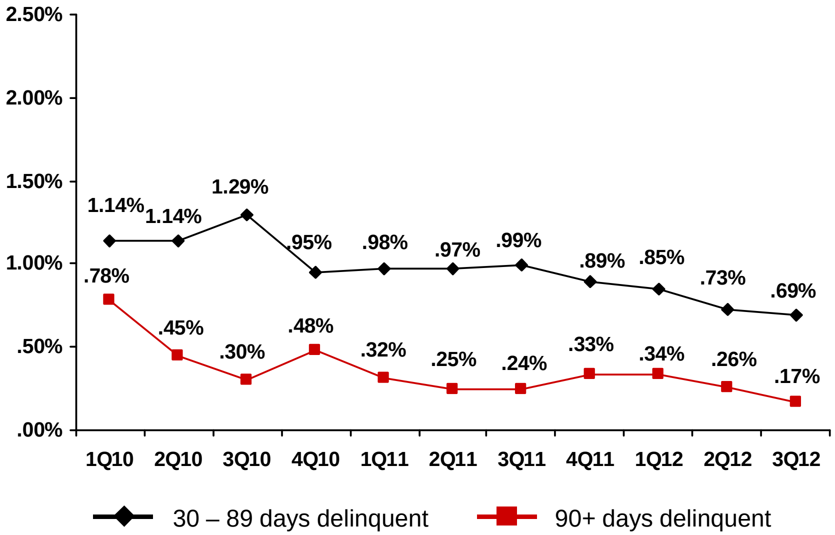
(a) Includes (1) the business aviation, commercial vehicle, office products, construction and industrial leases; (2) Canadian lease financing portfolios; and (3) all remaining balances related to lease in, lease out; sale in, lease out; service contract leases; and qualified technological equipment leases

(b) Includes loans in Key's consolidated education loan securitization trusts

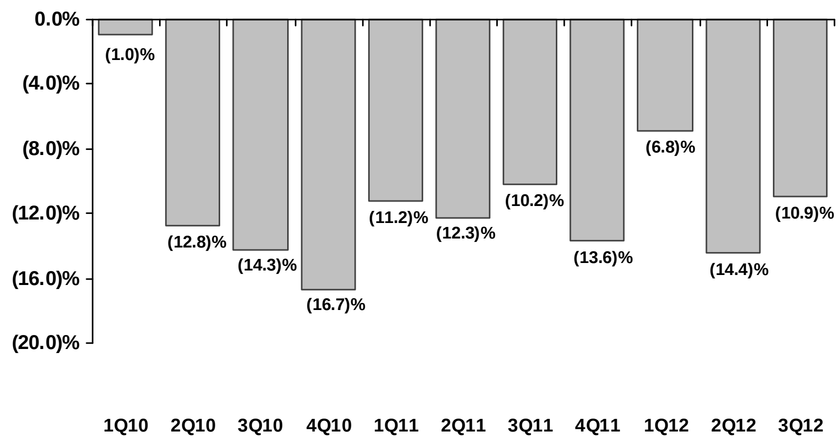
(c) Credit amounts indicate recoveries exceeded charge-offs

Credit Quality Trends

Delinquencies to Period-end Total Loans



Quarterly Change in Criticized Outstandings [(a)]



(a) Loan and Lease Outstandings

GAAP to Non-GAAP Reconciliation

$ in millions	Three months ended 9-30-12	6-30-12	9-30-11
Tangible common equity to tangible assets at period end			
Key shareholders' equity (GAAP)	**$ 10,251**	$ 10,155	$ 9,901
Less: Intangible assets [a]	**1,031**	932	935
Preferred Stock, Series A	**291**	291	291
Tangible common equity (non-GAAP)	**$ 8,929**	$ 8,932	$ 8,675
Total assets (GAAP)	**$ 86,950**	$ 86,523	$ 89,262
Less: Intangible assets	**1,031**	932	935
Tangible assets (non-GAAP)	**$ 85,919**	$ 85,591	$ 88,327
Tangible common equity to tangible assets ratio (non-GAAP)	**10.39 %**	10.44 %	9.82 %
Tier 1 common equity at period end			
Key shareholders' equity (GAAP)	**$ 10,251**	$ 10,155	$ 9,901
Qualifying capital securities	**339**	339	1,377
Less: Goodwill	**979**	917	917
Accumulated other comprehensive income (loss) [b]	**(109)**	(109)	88
Other assets [c]	**121**	71	72
Total Tier 1 capital (regulatory)	**9,599**	9,615	10,201
Less: Qualifying capital securities	**339**	339	1,377
Preferred Stock, Series A	**291**	291	291
Total Tier 1 common equity (non-GAAP) [d]	**$ 8,969**	$ 8,985	$ 8,533
Net risk-weighted assets (regulatory) [c]	**$ 79,363**	$ 77,236	$ 75,643
Tier 1 common equity ratio (non-GAAP) [d]	**11.30 %**	11.63 %	11.28 %
Pre-provision net revenue			
Net interest income (GAAP)	**$ 572**	$ 538	$ 549
Plus: Taxable-equivalent adjustment	**6**	6	6
Noninterest income	**544**	485	483
Less: Noninterest expense	**734**	714	692
Pre-provision net revenue from continuing operations (non-GAAP)	**$ 388**	$ 315	$ 346

(a) Three months ended September 30, 2012 excludes $130 million of period end and $86 million of average ending purchased credit card receivable intangible assets that are not fully excludable for capital purposes.

(b) Includes net unrealized gains or losses on securities available for sale (except for net unrealized losses on marketable equity securities), net gains or losses on cash flow hedges, and amounts resulting from the application of the applicable accounting guidance for defined benefit and other postretirement plans since its adoption.

(c) Other assets deducted from Tier 1 capital and risk-weighted assets consist of disallowed intangible assets (excluding goodwill) and deductible portions of nonfinancial equity investments. There were no disallowed deferred tax assets at September 30, 2012, June 30, 2012 and September 30, 2011.

(d) Tier 1 common equity is a non-generally accepted accounting principle (GAAP) financial measure that is used by investors, analysis and bank regulatory agencies to assess the capital position of financial services companies. Management reviews Tier 1 common equity along with other measures of capital as part of its financial analyses.

GAAP to Non-GAAP Reconciliation (continued)

$ in millions	Three months ended 9-30-12	6-30-12	9-30-11
Average tangible common equity			
Average Key shareholders' equity (GAAP)	**$ 10,222**	$ 10,100	$ 9,831
Less: Intangible assets (average) [(a)]	**1,026**	931	935
Preferred Stock, Series A (average)	**291**	291	291
Average tangible common equity (non-GAAP)	**$ 8,905**	$ 8,878	$ 8,605
Return on average tangible common equity from continuing operations			
Income (loss) from continuing operations attributable to Key common shareholders	**$ 214**	$ 221	$ 229
Average tangible common equity (non-GAAP)	**8,905**	8,878	8,605
Return on average tangible common equity from continuing operations (non-GAAP)	**9.56 %**	10.01 %	10.56 %
Return on average tangible common equity consolidated			
Net income (loss) attributable to Key common shareholders	**$ 214**	$ 231	$ 212
Average tangible common equity (non-GAAP)	**8,905**	8,878	8,605
Return on average tangible common equity consolidated (non-GAAP)	**9.56 %**	10.46 %	9.77 %
Cash efficiency ratio			
Noninterest expense (GAAP)	**$ 734**	$ 714	$ 692
Less: Intangible asset amortization on credit cards	**6**	—	—
Other intangible asset amortization	**3**	1	1
Adjusted noninterest expense (non-GAAP)	**$ 725**	$ 713	$ 691
Net interest income (GAAP)	**$ 572**	$ 538	$ 549
Plus: Taxable-equivalent adjustment	**6**	6	6
Noninterest income	**544**	485	483
Total taxable-equivalent revenue (non-GAAP)	**$ 1,122**	$ 1,029	$ 1,038
Cash efficiency ratio (non-GAAP)	**64.62 %**	69.29 %	66.57 %

(a) Three months ended September 30, 2012 excludes $130 million of period end and $86 million of average ending purchased credit card receivable intangible assets that are not fully excludable for capital purposes.

Tier 1 Common Equity under Basel III (estimated)

KeyCorp & Subsidiaries

TIER 1 COMMON EQUTIY UNDER BASEL III (ESTIMATES) [a]

($ in millions)	Quarter ended Sept 30, 2012
Tier 1 Common Equity under Basel I	$8,969
Adjustments from Basel I to Basel III:	
Cumulative Other Comprehensive Income [b]	(145)
Deferred Tax Assets [c]	(72)
Tier 1 common equity anticipated under Basel III [d]	$8,752
Total risk-weighted assets under Basel I	$79,363
Adjustments from Basel I to Basel III:	
Market Risk Impact	579
Loan Commitments < 1 Year	1,127
Residential Mortgage Loans & Home Equity	1,855
Other	1,119
Total risk-weighted assets under Basel III	$84,043
Tier 1 common equity to total risk-weighted assets anticipated under Basel III	10.41%

(a) Tier 1 common equity is a non-generally accepted accounting principle (GAAP) financial measure that is used by investors, analysis and bank regulatory agencies to assess the capital position of financial services companies. Management reviews Tier 1 common equity along with other measures of capital as part of its financial analyses.

(b) Includes AFS mark-to-market, cash flow hedges on items recognized at fair value on the balance sheet, and defined benefit pension liability.

(c) Deferred tax asset subject to future taxable income for realization, primarily tax credit carryforwards.

(d) The amount of regulatory capital and risk-weighted assets estimated under Basel III (as fully phased-in on January 1, 2019) is based upon the federal banking agencies' notices of proposed rulemaking, which implement Basel III and the Standardized Approach.