

August 11, 2025

Chief Counsel's Office
Office of the Comptroller of the Currency
400 7th Street, SW, Suite 3E-218
Washington, D.C. 20219

Ann E. Misback, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, D.C. 20551

Robert Meiers, Regulatory Attorney
Attn: Comments, Room MB-3013
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington D.C. 20429

RE: Call Report Revisions OMB Control No: OCC 1557-0081

To Whom It May Concern:

The American Bankers Association¹ (ABA) welcomes the opportunity to comment on the Joint Notice of Proposed Rulemaking (the Proposal) by the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency (Banking Agencies) on Federal Financial Institutions Examination Council's² (FFIEC) revisions to modify FFIEC Forms 031, 041, and 051, commonly referred to as the Consolidated Reports of Condition and Income (the Call Report). The Call Report provides data on individual banks, allows for trend analysis of bank condition and trend information about the overall banking industry and the data serve as the basis for other regulatory reporting and policy analysis.

The Proposal would make revisions to address the 2023 change in accounting that eliminated Troubled Debt Restructurings (TDRs) and added disclosure requirements to report the current period activity for loan modifications to borrowers experiencing financial difficulty and subsequent defaults of the related loans within 12 months of the modification.³ The proposed

¹ The American Bankers Association is the voice of the nation's \$23.5 trillion banking industry, which is composed of small, regional, and large banks that together employ more than 2.1 million people, safeguard nearly \$18.6 trillion in deposits, and extend more than \$12.3 trillion in loans.

² The Council is a formal interagency body who's voting members include the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), the Office of the Comptroller of the Currency (OCC), and the Consumer Financial Protection Bureau (CFPB), and the State Liaison Committee (SLC).

³ Accounting Standard Update (ASU) 2022-02

revisions would indicate that institutions should only report those loans that have been modified in the previous 12 months consistent with FASB ASC paragraph 310-10-50-42.

ABA supports the agencies' efforts to modernize and streamline regulatory reporting and appreciates the ongoing dialogue with industry stakeholders. We are especially grateful for the agencies' responsiveness to prior industry feedback and for the collaborative approach taken in developing these revisions. The thoughtful incorporation of changes related to the Financial Accounting Standards Board's (FASB) Accounting Standards Update 2022-02 demonstrates a strong commitment to transparency, clarity, and alignment with U.S. GAAP. We look forward to continued collaboration and thank the agencies for their leadership and dedication to effective supervision and sound banking practices.

We thank you again for the opportunity to provide comments and for your continued partnership with the banking industry. If you need additional information or have questions, please contact me ([REDACTED]; [REDACTED]).

Sincerely,



Joshua Stein