



Comenity Bank

Comenity Capital Bank

January 30, 2026

**SUBMITTED ELECTRONICALLY VIA [www.FDIC.gov](http://www.FDIC.gov)**

Jennifer Jones  
Deputy Executive Secretary  
Federal Deposit Insurance Corporation  
550 17th Street NW  
Washington, DC 20429

**Re: Request for Information: Streamlining the Call Report (RIN 3064-ZA51)**

Dear Ms. Jones:

Comenity Capital Bank, a Utah industrial bank, and Comenity Bank, a Delaware commercial bank (together, the “**Banks**”) appreciate the opportunity to comment on the above-referenced Request for Information (the “**RFI**”) from December 1, 2025 regarding the approach of the Federal Deposit Insurance Corporation’s (the “**FDIC**”) and other federal agencies to potentially streamline the Consolidated Reports of Condition and Income (Call Report) forms and instructions while still meeting the purposes of the collection. Please see our targeted feedback below that addresses two of the questions on which commenters were invited to comment. Changes and clarifications in these two areas could provide significant improvements and reduce the related reporting burden for affected institutions.

1. Which specific line items or schedules on the Call Report are the most time-consuming to prepare or require significant manual adjustments (for example, to convert internal data from core data processing, general ledger, or other systems into the form required) to complete the Call Report? Why is this the case?

With respect to the first general question from the agencies concerning manual adjustments for Call Reports, we recommend eliminating discrepancies between generally accepted accounting principles (GAAP) and regulatory accounting principles. Removing these permanent reporting differences would enable the Banks to expand direct feeds from our accounting platform into our reporting software, resulting in faster compilation, simplified reconciliation with GAAP financials, and an enhanced review process.

13. Similarly, in what ways should the eligibility for reduced reporting be related to a respondent’s business model and why? What readily available quantitative criteria do commenters consider most indicative of a community banking organization conducting a traditional banking model and why?

Regarding question thirteen, we recommend expanding short form eligibility based upon business models, irrespective of total asset thresholds, and reducing submissions to a

semiannual basis. For special-purpose banks, such as ours, the nature of the business model limits activity, such as specific loan types or investments, resulting in many Call Report fields being inapplicable. Implementing the short form could reduce the number of schedules, most of which do not appear to provide beneficial insights with the objective of ensuring the safety and soundness of such institutions. Additionally, we recommend the edit check thresholds are changed to be dynamic and link to either form type or specialty purpose business model designation, and adapt to macro-environmental changes.

The Banks appreciate the opportunity to provide commentary on the RFI. If you have any questions concerning the Bank's comments or would like the Banks to provide further information, please do not hesitate to contact us.

Respectfully submitted,

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Bruce Bowman  
President, Comenity Capital Bank

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Baron Schlachter  
President, Comenity Bank