

February 3, 2026

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

Benjamin W. McDonough, Deputy Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, D.C. 20551

Jennifer Jones, Deputy Executive Secretary,
Attn: Comments RIN 3064-ZA51
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington D.C. 20429

Re: Request for Information: Streamlining the Call Report – RIN 3064-ZA51, OMB Control No: OCC-2025-0471.

To Whom It May Concern:

This letter is being submitted by International Bancshares Corporation ("IBC"), a publicly traded, multi-bank financial holding company headquartered in Laredo, Texas. IBC maintains 166 facilities and 256 ATMs, serving 75 communities in Texas and Oklahoma through five separately chartered banks ranging in size from approximately \$500 million to \$9.8 billion, with consolidated assets totaling over \$16.5 billion. IBC is one of the largest independent commercial bank holding companies headquartered in Texas.

IBC appreciates the opportunity to comment on the Office of the Comptroller of the Currency (OCC), Federal Reserve Board (Fed), and Federal Deposit Insurance Corporation (FDIC), herein referred to as "Banking Agencies", Request for Information on Streamlining the Call Report. IBC writes in strong support of the American Bankers Association's (ABA) comment letter submitted on or around January 30, 2026. We concur with the ABA's overarching objective to reduce unnecessary reporting burden while preserving the safety-and-soundness value inherent in the Call Report.

IBC particularly endorses the ABA's recommendation to harmonize definitions, instructions, and timelines across regulatory reports, most notably between the Call Report and the FR Y-9C. The ABA correctly observes that misalignments, even temporary ones, drive duplicative mapping, manual rework, and control complexity without improving supervisory outcomes. Aligning terms and treatments across forms will improve data quality and materially reduce burden.

For a publicly traded organization such as IBC, the practical impact of inconsistency is acute. The FR Y-9C is a roll-up of the Call Reports, yet definitional and structural differences frequently force re-calculation and re-consolidation solely to complete the Y-9C after preparing the Call Reports. This is inefficient and risky within the compressed reporting window. In a typical quarter, our teams

simultaneously manage five Call Reports, two Y-9s, five Y-8s, a Form 10-Q, and interim audit procedures—all on roughly a 30-day timetable. Ensuring that the Call Report and FR Y-9C are fully consistent would meaningfully streamline this workload, reduce error risk, and allow staff to focus on the highest-value supervisory analytics rather than reconciliation mechanics.

Consistency in regulatory reporting is not merely a matter of administrative convenience; it is fundamental to the integrity and effectiveness of the entire process. IBC appreciates your consideration of these comments and urges the Banking Agencies to keep consistency at the forefront as you move forward with regulatory reporting reforms.

Respectfully submitted,

INTERNATIONAL BANCSHARES CORPORATION



Dennis E. Nixon
President and CEO