PERFORMANCE TRUST
CAPITAL PARTNERS®

January 30, 2026

VIA E-MAIL ONLY

Chief Counsel's Office,
Attention: Comment Processing,
Office of the Comptroller of the Currency,
400 7th Street SW, Suite 3E–218,
Washington, DC 20219 OCC–2025–0471

Benjamin W. McDonough,
Deputy Secretary
Board, Board of Governors of the Federal Reserve System,
20th Street and Constitution Avenue NW,
Washington, DC 20551
OP–1872

Jennifer Jones, Deputy
Executive Secretary,
Attention: Comments RIN 3064–ZA51,
Federal Deposit Insurance Corporation,
550 17th Street NW,
Washington, DC 20429

Re: Request for Information and Comment: Streamlining the Call Report (Docket ID OCC-2025-0471, Docket No. OP-1872, RIN 3064-ZA51)

Ladies and Gentlemen,

PT Score® (PTS), a division of Performance Trust Capital Partners, LLC® (PTCP)[1], appreciates the opportunity to submit comments on the above-referenced Request for Information and Comment (RIC). The RIC was released on December 1, 2025, by the Board of Governors of the Federal Reserve System (FRB), the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC), (together, the "Agencies") and is seeking input on ways to streamline the Call Report to better align with the size and complexity of the reporting institution.

For reference, PTS is a strategic risk management system that helps financial institutions optimize performance through more effective management of risk and regulatory positions. Initially created in a regulatory setting to monitor banking conditions, the PT platform has evolved into a comprehensive system that delivers critical insights on important risk and regulatory issues. Nationwide, financial institutions, regulators, institutional investors, trade associations, and banking professionals rely on PTS analytics to assess risk conditions across the industry. Over 600 financial institutions and 2,000+ individual subscribers currently use PTS to perform key risk management functions for their organizations.

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PTS uses Call Report information as a foundation for the risk assessments and comparative analytics that are used within the system. While PTS is very much in favor of efforts that could reduce operating costs and improve the efficiency and reliability of reported information, we believe that indiscriminate changes to reporting requirements could actually increase regulatory burden and undermine the effectiveness of the supervisory process. We also do not see the value in semi-annual reporting of a short-form version of the report with reduced content. Nearly all Call Reports are prepared with supportive software, so changing the reporting protocols quarter-to-quarter would seem to add more complexity and confusion to the process.

In a 2025 PTS survey with over 400 industry participants, only 27% agreed and 52% disagreed that Call Report Modernization should occur if it would create less transparency on industry conditions and trends. Banks, regulators, advisors, consumers, analysts, and others rely on bank Call Report data to regularly understand and evaluate conditions within the banking system and the broader economy. At a time where regulators are seeking to streamline examination processes and reduce on-site supervisory burden with banks, substantive reductions in Call Report information could decrease the effectiveness of off-site surveillance and force regulators to perform more activities on-premises.

From PTS's perspective, the most significant concern that we and our clients have with the Call Report process is inconsistency/inadequacy of reported information. In certain cases, the Call Report is collecting insufficient data that is used to feed the Uniform Bank Performance Report and other regulatory screening systems. These inadequacies can create false flags that can undermine regulatory effectiveness and industry analysis. In light of this, we believe the RIC cannot simply focus on reducing call report fields or reporting time frames. Effective streamlining of the Call Report should concentrate on reducing redundancies, improving reporting instructions, and enhancing the consistency and reliability of the system for all effected users. If reported information can be improved and made more reliable, regulatory offsite analysis, industry monitoring, and bank risk-management can improve substantially.

We would welcome the opportunity to have a comprehensive discussion on the range of options that exist to improve reporting structures. However, for illustration purposes, the following items represent three areas where the absence of information from the Call Report creates notable gaps in quality and effectiveness of the data.

- **Type 31,41,51 RC-B Memoranda—Item 1 – Pledged Securities:** This item is used in a variety of ratios to show the liquidity impact of pledged securities. Currently, pledged securities are typically removed from available liquid assets for liquidity analysis (ex. On-hand Liquidity Ratio). This creates a false flag, particularly if a bank conservatively pledges securities to secure emergency wholesale funding. A simple solution would be 1) report the amount of securities that are pledged for borrowings vs. specific preferred deposits, and 2) show the total borrowing capacity vs. unused capacity of any outstanding line of credit. This approach would provide a more accurate presentation of a bank's true liquidity position, including access to broader funding sources.

- **Type 31,41,51 RC-N Item 11 – Government Guaranteed Loans:** This item aggregates past due loans that are or wholly or partially guaranteed by the US Government. While this reporting treatment provides an exposure adjustment for past-due credits, other positions that might demonstrate a level of credit risk are not similarly adjusted. A simple solution would be to record the total outstanding balance and the guaranteed portion of all loans with this type of guarantee. This allows for the recognition of guaranteed positions across a variety of different observations.

- **Type 51 Schedule SU Item 1 – Derivatives (other information is contained in RC-F, RC-G and RC-R):** This item separates the total notional amount of interest rate derivatives vs other derivatives. Other schedules show net fair value positions. Additional derivative-related information is reported in Schedule RC-R, but this section is only completed semi-annually and is not required for banks that do not adopt Community Bank Leverage Ratio. This is an area where the absence of information and dispersed reporting creates confusion and limits off-site evaluation of a bank's activities. Derivatives can play an important role in effective risk management and there should be some method for a bank to demonstrate this activity without complex reporting required in 31 and 41 Call report forms.

These examples are illustrative rather than exhaustive and are intended to demonstrate how targeted refinement (not just streamlining) of the Call Report requirements could materially improve the reporting and evaluation experience for all constituents. As noted in Item 21 of the RIC, PTS is committed to helping banks and their regulatory counterparts "balance the content and frequency of reporting requirements, on-site examinations, and discussions with management to better achieve the agencies' missions and limit burden for institutions." We believe that the right information, collected and presented in the right format, will help improve bank/regulatory interactions and will ultimately lead to a less burdensome environment and higher levels of performance across the industry.

PTCP and PTS appreciate the opportunity to comment on this proposal and would welcome further dialogue on this and other regulatory improvement initiatives. If you have any questions or would like additional information, please do not hesitate to contact me at your convenience.

Bart Smith

Managing Director & Partner

Performance Trust Capital Partners, LLC

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[1]Founded in 1994, Performance Trust Capital Partners, LLC helps community financial institutions maximize profitability through strategic financial advisory services. By deploying a disciplined analytical approach to investing, the firm provides objective, transparent, and unbiased advice that allows clients to make confident and informed investment decisions. The company also has a strong educational focus, teaching decision makers how to make beneficial choices for their institutions with the aim of producing consistent, significant improvement in their long-term performance. PT Score® is a proprietary risk management system that uses Call Report data and other institution-supplied information to create unique observations about an institution's risk exposures.

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