



January 28, 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 on Streamlining the Call Report

To Whom It May Concern:

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing nearly 180 state and nationally chartered banks, savings banks, and savings and loan associations of all sizes located in Wisconsin, their branches, and over 30,000 employees. WBA appreciates the opportunity to comment on the Request for Information (RFI) issued by the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation (agencies) regarding opportunities to streamline the Consolidated Reports of Condition and Income (Call Report).

The agencies have issued the RFI in preparation for their required five-year statutory review of Call Report Data. As such, the agencies are seeking input on ways to streamline the Call Report to better align reporting requirements with each bank's size and complexity. Call Report preparation remains a complex, burdensome process for many banks. While impact varies by size and complexity, the resources and expertise required remains significant. WBA welcomes the agencies' efforts to identify opportunities to reduce unnecessary burden while preserving effectiveness and offers the following comments.

Manual Data Entry and Technology

Key schedules remain highly manual, often requiring data to be extracted from multiple internal systems and reconciled with Call Report definitions. Schedules related to regulatory capital, loan categorization, and complex memoranda items are particularly resource intensive. Furthermore, oftentimes, certain internal systems do not map cleanly to Call Report categories.



Even where third-party vendors offer supplemental modules, additional configuration or manual verification is required. With this in mind, WBA encourages the agencies to evaluate which line items could be simplified, aggregated, or aligned more closely with standard internal reporting practices.

Additionally, while some systems offer Call Report automation, many vendors do not fully support the granularity required for certain data items. For example, the Call Report's loan category definitions, including distinctions among various commercial loan subtypes or collateral codes, often do not align with how these loans are categorized within core systems. As a result, automated data feeds may fail to properly complete these fields, requiring staff to override the system and enter adjustments manually. WBA encourages the agencies to identify areas where definitional alignment, or perhaps even reduced granularity, could reduce reliance on manual work.

The agencies have posed the question of what technology changes could reduce respondent burden, such as more intuitive submission interfaces, pre-populated recurring data fields, and enhanced data-validation tools. WBA agrees that these tools would meaningfully improve efficiency and data quality. We would encourage the agencies to continue modernizing submission systems and to work with filers of varying sizes and operational structures to ensure that any technological enhancements address the diverse needs across the industry.

Unnecessary Complexity of Rare Items

Oftentimes, banks must complete or review Call Report items that rarely or never apply to their operations. For example, banks without trading activities must still review schedules related to trading assets and liabilities, and banks without international operations must confirm the inapplicability of line items concerning foreign offices or cross-border exposures. Similarly, many banks that do not engage in securitization, complex capital calculations, or fiduciary and wealth-management services must still regularly validate those reporting fields. The inclusion of these items increases the time and expertise necessary to complete and validate Call Reports with an unnecessarily increased risk of error while providing no increased value. WBA encourages the agencies to further tailor Call Reports and instructions so that line items only apply when relevant.

Additional Considerations for Efficiency

During the EGRPRA review, the industry suggested exploring adjustments to Call Report due dates to avoid weekends, holidays, and peak internal operational periods. WBA echoes that suggestion here. Even minor shifts in deadlines can significantly improve workflow.

The agencies are also considering whether to further streamline the FFIEC 051 version of the Call Report and expand the availability of that form to banks with significantly greater than \$5 billion in total assets. WBA strongly supports this expansion. Expanding access to a simplified reporting form would help better align requirements with risk.

Additionally, WBA supports reviewing whether certain data items could be collected less frequently or in more aggregated form, particularly for banks with smaller operations. At the same time, WBA encourages careful evaluation before increasing the frequency or granularity of any item, given the varied capacity across banks to absorb additional reporting requirements.



WBA also appreciates the agencies' recognition of the trade-off between reporting burden and supervisory expectations. The most effective approach is one in which reporting requirements are calibrated to bank size and risk, accompanied by regular supervisory communication with bank management. This balance allows for effective monitoring without imposing highly technical or unnecessarily complex reporting obligations that divert resources from customer service and prudent risk management.

Conclusion

WBA appreciates the agencies' commitment to evaluating ways to streamline the Call Report and reduce unnecessary regulatory burden. We encourage the agencies to adopt an approach in consideration of these comments.

Sincerely,



Rose Oswald Poels
President/CEO