
From: Nancy Cone <Ncone@bankoftescott.com>
Sent: Wednesday, March 06, 2013 12:40 PM
To: Comments
Subject: "Consolidated Reports of Conditon and Income, 3064-0052"

To whom it may concern:

I am with a 300million dollar community bank in the rural Kansas with five branches. We do currently offer separate accounts for consumer deposit accounts. What we do not do now is track the fees and income from these type of accounts separately. This proposed change in reporting would require some big system changes to be able to track the fees and income from consumer deposit accounts and be able to break them out. If this change was made today we could with a lot of work, break out the monthly maintenance charges (or at least the majority of them) for consumers but there would be no way with our systems today to break out the overdraft fees or ATM fees. If this is something that is needed, then coding for fee's and income would need to be changed and core systems and General Ledgers updated with changes as well. Asking the new screening question in Call Report Schedule RI memorandum item 15 in June 2013 could be used to determine if most banks offer consumer deposit accounts or not this year. If the need for the fee information is then needed then at least a year's time is needed for bank to update codes and change General Ledger accounts and get the information needed to report consumer deposit accounts fees and income. So if the breakdown of fees and income is required then reporting on the Call Report correctly could not be done until at least March 2014 and the information be correct information.

Thanks for allowing me the opportunity to make a comment.

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