
From: Fred Wolford <FWolford@ShelbyBank.Com>
Sent: Tuesday, April 02, 2013 11:55 AM
To: Comments
Subject: Consolidated Reports of Condition and Income, 3064-0052

Proposed changes in the Consolidated Reports of Condition for 2013.-

I would like to comment on the proposed changes to the 2013 Consolidated Reports of Condition as in the FIL-8-2013 letter. After reading the proposed changes I have been inquiring on how we would be able to get the information that is being requested on a breakdown on the year to date amounts of certain types of service charges on consumer deposit accounts reported as noninterest income in schedule RI.. . What I have found out is that our systems do not currently support the separate identification of these categories and that it would take a large amount of time and money (in the thousands of dollars) to convert our systems to be able to report separate year to date amounts with a breakdown of fees that are being requested in the new memorandum item 15. We still have not been able to determine how exactly we would be able to separate out some of the consumer deposit fees into the categories that would be required. The amount of time and money to separate out the consumer Overdraft related charges, monthly maintenances charges, automated teller machine fees and all other service charges and fees would be an extreme hardship and extremely burdensome on our small financial institution. Therefore I am requesting that this proposed change be reconsidered.

Thank You,
Fred Wolford
Controller
Shelby State Bank