

Dear Sirs,

Thank you for the opportunity to submit comments on proposed revisions to the Call Report. As the person who prepares our bank's call report, I appreciate efforts to lighten the workload that comes around every quarter. We are a \$4 billion community bank, with standard community bank activities. Below are my comments about the impact these revisions would have to preparing our bank's quarterly call report.

I'll start with comments about the revisions proposed to take effect for the December 31, 2015 reporting period. Most of the changes will actually have no effect, or a negligible effect to us. For instance, the increase on schedule RI-E from \$25,000 to \$100,000 does not impact us. We are governed more by the other reporting requirement that triggers reporting when items exceed 3% of items reported on schedule RI. By the end of the year, that 3% threshold is well above \$100,000. So that 3% threshold has more bearing on whether we report on this schedule than the dollar limit does. Also, the additional detail line items added to this report are either items we already add to the schedule, or can easily add.

Similar to the RI-E change, the revisions to RC-F and RC-G for other assets and other liabilities to move their threshold for reporting from \$25,000 to \$100,000 will not impact our reporting. Because of the size of our balance sheet, we are impacted more by the 25% threshold. So this will also have no impact to us. We are also not impacted by the inclusion of the new reporting items on RC-F (proposed lines 6.f. through 6.h.), as our bank does not have these types of assets.

One item that will have some impact is the change to the reporting of time deposits that moves the above and below break from \$100,000 to \$250,000. We currently have a supplementary report from our software provider that separates the time deposits into amounts less than \$100,000, greater than \$100,000 and less than \$250,000, and greater than \$250,000. We use this provided report to complete schedule RC-E, so that change will have a negligible impact to us.

For the revisions proposed to take effect in the March 31, 2016 reporting period, the biggest impact to our bank will be for the proposed revision to schedule RI and the cut off for interest income on time deposits. This would be the change from time deposits less than or greater than \$100,000 going to a cut off of \$250,000. I talked with our software provider, and we would need to either set up or revise our table for account types of time deposits. Our system is set up so that the account types are tied to various general ledger accounts for balance sheet and income statement reporting. We would need to revise the table of account types, and then adjust the mapping tables to have the deposits reported in the appropriate liability accounts on the general ledger, and the interest expense on these deposits reported in appropriate accounts on our income statement. Once we make this change, this would also take care of the proposed revision for RC-K in this quarter, as the account balances and averages would then be getting reported in the appropriate place on our ledgers, which we use as the source for this schedule of the call report. Of all the proposed revisions to the call report, this is really the only one that will have some impact to our bank.

All of the other changes to reduce reporting requirements really have no impact, or little impact to us, as these are not activities our bank is engaged in, and thus, we were not reporting anything previously.

I again thank you for the notice of proposed changes, along with the opportunity to provide comments. If you have any questions about my comments, or would like more information, please let me know.

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