HERRING BANK

MEMBER FDIC

October 13, 2016

To Whom It May Concern:

While we appreciate the effort to reduce the burden on community banks, we believe the revisions to the call report fall short. Most financial institutions under $1 billion in assets report very little or do not report at all on many of the schedules that the changes affect. In short, the changes have only limited the thickness of the call report and have done very little to reduce the burden.

For example, the table below should give a better idea of how much we report on the schedules included in the proposed changes.

Summary of Significant Changes

	Items Reported by Us	Total Reportable Items	%
RC-D	0	66	0.00%
RC-L	11	150	7.33%
RC-P	4	25	16.00%
RC-Q	8	95	8.42%
RC-S	2	118	1.69%
RC-V	0	54	0.00%
	25	508	4.92%

The schedules above have a total of 508 possible reportable items, which represents approximately 20% of the total approximately 2,400 reportable items in the entire call report. As you can see above, of this 20% of reportable items our bank reports less than 5%. Furthermore, as we understand, these items will remain reportable through indicator questions instead of empty or blank cells.

We would imagine that the proposed changes would have very little, if any, effect on the amount of time required to complete the quarterly call report. Below is a history of what the FDIC has estimated, in hours, for each bank to complete the call report each quarter.

Estimated Hours to Complete Call Report		
Year	**Agency**	**Hours**
1996	FDIC	28
2005	FDIC	37
2015	FDIC	45

Over the last twenty years, the estimates have increased on average by almost one hour each quarter per year.

In summary, we would ask that further reductions be made to schedules such as RCCI, RCCII, RCO, and both schedules of RCR. Thank you for your consideration in this matter.

Sincerely,

Nathan Terry
Controller
Herring Bank