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Public Comments on Agency Information Collection Activities; Proposals, Submissions, and Approvals:=====

Title: Agency Information Collection Activities; Proposals, Submissions, and Approvals

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Organization Name: South Carolina Bankers Association

Comment: Manuel E. Cabeza, Counsel

Attn: Comments

Room MB-3105

Federal Deposit Insurance Corporation

550 17th Street NW

Washington, DC 20429

Re: FFIEC 031, FFIEC 041 and FFIEC 051

Dear Mr. Cabeza:

On behalf of the 75 member banks of the South Carolina Bankers Association (SCBA) I offer this comment to the proposed streamlined Call Report (FFIEC 051). SCBA appreciates the opportunity to provide these comments as most of our banks are under \$1 billion in assets and spend considerable time gathering the information necessary for the present Call Report (FFIEC 041). Still, SCBA also understands the need for comprehensive call reports.

With this in mind, SCBA would like to thank the banking agencies for taking the time to survey community banks about the process involved in compiling call reports and then to propose changes that would simplify this process for banks under \$1 billion. As the proposal notes, comments to the outreach "[addressed] the substantive burden arising from reviewing the Call Report instructions on a quarterly or other periodic basis even for those data items applicable to an institution for which the institution determines there is no information for it to report."

Most of our banks should be able to comply with a March 31, 2017 implementation date; however, SCBA asks that the banking agencies take into account that software vendors that banks uses for the Call Report must conform their systems and products to the changes made. As such, SCBA asks that the banking agencies allow for a six month lead time from adoption of the new Call Report (FFIEC (051) to allow for these changes to be implemented.

SCBA is hopeful that the proposed streamline Call Report (FFIEC 051) for banks under \$1 billion would truly be less burdensome as the present reports require considerable time and resources to gather the information and complete the present report. Thank you again for taking the time to listen to our community banks and proposing changes that would simply this necessary process.

With kind regards,

A. O'Neil Rashley, Jr.  
Senior Vice President and Counsel

Manuel E. Cabeza, Counsel  
Attn: Comments  
Room MB-3105  
Federal Deposit Insurance Corporation  
550 17th Street NW  
Washington, DC 20429

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