
From: dwilson
Sent: Friday, October 07, 2016 2:03 PM
To: Comments
Subject: FFIEC 031, FFIEC 041, and FFIEC 051

First State Bank of San Diego would qualify to prepare the streamlined FFIEC 051 and supports those changes to the Call Report. We use software leased from our core data processor to assist in preparation of the Call Report. Allowing the option of continuing to prepare FFIEC 041 gives us time to evaluate the cost of upgrading the software (when available) compared to the efficiencies of reduced burden. Therefore, we support the initial implementation date of March 31, 2017 with the option to continue preparing FFIEC 041.

Dale Wilson, CEO