From:	Dianne Hinsch
To:	Comments
Subject:	Call Report Relief
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Dear Sirs:

I am writing concerning regulatory relief for small community banks. Our bank is around 60MM in assets. The call report currently is 85 pages. Did you understand 85 pages! The changes coming will increase that number with additional schedules and additional pages. What was the intended purpose of those additional schedules? What is the value of pages and pages of blank schedules? It only makes sense to have graduated tiers for completion of schedules based on the complexity of your institution. Think about other small businesses. If I have a company with 10 employees versus a company with 250 employees, look at the different requirements. From employee benefits, tax returns, accountants, and business plans are totally different. Why can't you use the same basis for the call report?

It's so difficult to compete with the large banks; non-banks (FSA – government subsidized entity, Uninsured - grain elevators, insurance companies); and credit unions (the original government subsidized non-profit financial institution (ha, ha Non-profit sure!)). There is a reason why we are seeing a decline in the number of smaller financial institutions. The existing & pending regulations, compliance expense and reporting requirements make it hard to be confident in our strategies. When a community bank is closed or sold the ripples will reach far and wide. Community Banks have a tradition of commitment to our communities and provide core people for most of the volunteer hours in our communities. Community banks have very different mission statements compared to large financial institutions. For example here is our Mission Statement: *Integrity Bank Plus is a growing, profitable bank operating with Integrity. Our employees are actively involved in our communities and together help our customers achieve financial success.*

In order to verify all the schedules on the Call Report - it takes on average 40-50 hours to complete and submit. We do use software to help with gathering this information, but in order to verify the numbers we complete several cross checks. I have no idea the amount of time it will take for the scheduled changes coming. CECL is really a wild card. In trying to understand the parameters of this, it looks like we could have a fluctuating numbers quarterly. I'm not sure how those quarterly changes in the ALLL will accurately reflect real issues in the loan portfolio. I'm not convinced that this is the best measurement. It appears to be another requirement that will eat up employee & staff hours with no measureable return. Stop the nonsense now! What makes sense to me is to use actual loss experience. That would be representative of our loan portfolio makeup. I know past experience isn't always an indicator to future performance, but it is certainly better than a stab in the dark.

Go after the banks that are creating all the issues and have the fines and penalties being assessed. Don't make the rules based on one or two large bank's mis-management and regulatory failures. Focus where the real issues lie. FDIC, OCC and the Federal Reserve Bank are the best judges of the what is needed and how it should be obtained and reported.

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