

**To:** [Comments](#)  
**Subject:** FFIEC 031, FFIEC 041, and FFIEC 051  
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I have been at the bank since 1986 and have prepared the call report every time since then and have seen it get longer and more burdensome each year, so I was excited to hear that we were going to get some relief. After analysis of the changes I decided that relief would not be coming with these changes. I compared the new report to my June 30, 2016 report and while there are less pages. There is not less work. I have compiled my analysis below..

Schedule RI Memoranda 15a thru 15d  
This schedule only applies to banks > 1 billion

Schedule RI-B M.2.a thru M.2.d  
This schedule applies to banks > 300 million

Schedule RI-B Part II Memoranda M.1 thru M.3  
This applies only to banks that issue credit cards

Entire schedule RI-C  
This applies to banks > 1 billion

RC-B 5.a thru 5.f  
This applies to banks > 1 billion

RC-C Part 1 memoranda 10 and 11 M.10.a.1 thru m.11.d  
This applies to banks that have elected a measure loan at fair value ( I would think most community bank would not elect this)

RC-C Part 1 memoranda M12.a thru m12.d was combined to just M12  
We answer all 0's for these questions

Entire Schedule RC-D  
This applies to banks that have average trading assets > 2 million

Schedule RC-E memoranda M.6.a thru M.7.b.2  
This applies to banks > 1 billion

Schedule RC-L 12 thru 15.b.2  
This has to do with derivatives and we answer all 0's for it.

Schedule RC 16  
This applies to banks > 10 billion

RC-M 13 a.(1)a(1) thru RC-M 14.b  
This applies to banks that have a loss sharing agreement with the FDIC

Schedule RC-N 11 a.(1)a thru 11.f  
This applies to banks that have a loss sharing agreement with the FDIC

Schedule RC.N M.3.a thru M.3.d  
This applies to banks > 300 million

RC-O M.6.a thru M.18.j  
This is to be completed by "Large Institutions" and "Highly Complex Institutions" as defined by the FDIC

Entire Schedule RC-P

This applies to banks > 1 billion

Entire Schedule RC-Q

This applies to banks > 500 Million

Entire Schedule RC-S

This schedule had to do with servicing, securitization and asset sales we answer all 0's for this schedule

Entire Schedule RC-V

This has to do with Variable Interest entities we answer all 0's for this schedule

They did add a new schedule. Schedule SU and there are 9 questions I will have to answer that I did not before.

This not relief at all!

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