

**To:** [Comments](#)  
**Subject:** FFIEC 031, FFIEC 041, and FFIEC 051  
**Date:** Wednesday, October 12, 2016 4:22:08 PM  
**Attachments:** [image001.png](#)

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As the Chief Financial Officer of a small community bank, about \$140 million in assets, I fully support your effort to simplify call reporting for small banks. Our most recent call report was 85 pages, significantly longer than that of our audited financial statements with footnotes.

I think getting rid of all the items that don't apply to small banks is the first step in reducing the wasted paper inherent in an 85 page document where at least 50% of the boxes are not completed.

I would encourage the collection of Certificate of Deposit averages that are consistent with the current limits of \$250,000. The collection of time deposits average balances of \$100,000 or more is outdated and causes reconciliation issues.

I believe that reciprocal brokered deposits are more logical to include in Schedule RC-E rather than RC-O.

While I understand the value of collecting mortgage originations and sales on the RC-P schedule, I really doubt the benefit of the breakouts of the types of loans.

Thanks for the opportunity to comment.

**Don Madsen**

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