From: Dorn, Phillip J.
Sent: Tuesday, November 20, 2018 1:21 PM
To: Comments
Subject: FDIC RIN 3064–AE82

While EGRIPRA processes are important considerations as regulatory agencies, I believe this particular proposal may have unintended consequences for the impacted institutions.

Most institutions already have systems in place to report on existing Call Report items. Additionally, all institutions will still need to have systems in place to appropriately report on all required items at least 2 times per year. The volume of benefit from not reporting certain items during 2 of 4 Call Reports may actually cause more Call Report errors or confusion as there are different expectations on a quarterly basis. Additionally, some of the omitted items are used as part of regulatory and investor offsite monitoring processes. Limiting this information may actually result in increased information requests or review of certain items during examinations due to the more limited information on the Call Reports and actually create greater burden than the relief provided by filing a more limited report 2 times per year.

Another question that should be posed is….Would banks prefer to report a few more items on a Call Report, or face additional scrutiny or review during examinations? Perhaps the opposite action, adding selected fields to regular Call Reports, could have a greater impact in reducing regulatory burden, by providing better information for offsite examination review and limiting onsite disruptions from a regulatory examination process.