



## Independent Bankers Association of Texas

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January 11, 2019

Ann E. Misback, Secretary

Board of Governors of the Federal Reserve System

20th Street and Constitution Avenue NW., Washington, DC 20551

Re: Docket No. R-1618 and RIN 7100-AF12,

Legislative and Regulatory Activities Division

Office of the Comptroller of the Currency

400 7th Street, SW., suite 3E-218, Washington, DC 20219

Re: Docket ID OCC-2018-0032"

Robert E. Feldman, Executive Secretary

Attention: Comments/Legal ESS

Federal Deposit Insurance Corporation

550 17th Street, NW, Washington, DC 20429

Re: FDIC RIN 3064-AE82

Via Federal eRulemaking Portal: <http://www.regulations.gov>

Re: Reduced Call Reporting for Covered Depository Institutions

Ladies and Gentlemen:

The following comments are submitted on behalf of the Independent Bankers Association of Texas ("IBAT"), a trade association representing nearly 400 independent, community banks domiciled in Texas.

This proposal implements section 205 of the Economic Growth, Regulatory Relief and Consumer Protection Act (EGRRCPA, S. 2155; Section 205) and would permit banks with total assets of less than \$5 billion that do not engage in certain complex or international activities to file the most streamlined version of the Call Report, the FFIEC 051 Call Report. The agencies also are proposing to reduce by approximately 37 percent the number of existing data items reportable in the FFIEC 051 Call Reports for the first and third calendar quarters.

The principal areas of reduced reporting in the first and third calendar quarters generally would include data items related to categories of risk-weighting of various types of assets and other exposures under the agencies' regulatory capital rules, fiduciary and related services assets and income, and troubled debt restructurings by loan category. It's important to note that many community banks do not compile data for a number of the fields proposed for reduced reporting. In fact, Sen. John Kennedy (R-La.) said the proposed changes would only save banks 1.18 hours per quarter during questioning with Federal Reserve Vice Chairman for

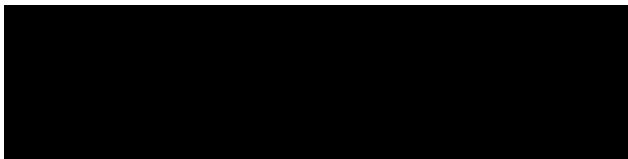
Supervision Randal Quarles. That amounts to less than 3 hours a year and is NOT meaningful relief.

Section 205 does not require the creation of a new short-form Call Report. Relief can be quickly achieved with the elimination of the requirement to complete many of the multiple (eighteen!) detailed schedules in the current Call Report. Community banks could simply complete the balance sheet (RC), income statement (RI), and regulatory capital (RC-R) schedules in the first and third quarters until a short-form Call Report is adopted that would include only those schedules.

The Independent Community Bankers of America (ICBA) conducted a nationwide survey in 2014 in which 72 percent of respondents agreed that Call Report relief would provide a 'substantial reduction' in the reporting burden. But that 'substantial reduction' is dependent upon meaningful relief, and that only comes with a reduction in the schedules required to be completed. The desired regulatory relief is achieved by eliminating preparation of entire schedules.

We sincerely appreciate this effort to simplify Call Report requirements for community banks in Texas and across the nation, however the proposal simply does not go far enough and does not provide the meaningful relief mandated under EGRRCPA.

Sincerely,



Christopher L. Williston, VI, CAE  
President and CEO