usbank ®

BC-MN-H19R
800 Nicollet Mall
Minneapolis, MN 55402

November 13, 2007

Leneta Gregorie
Legal Division
Attention: Comments, Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: Survey of Large-Bank Deposit Insurance Programs

U.S. Bank National Association (USBNA) would like to thank you for this opportunity to
comment on the ANPR for the Survey of Large-Bank Deposit Insurance Programs.
While USBNA appreciates the process that the FDIC has undertaken to assess the impact
of its proposal to require large banks to report extensive details on insured-depositor
status, the reporting would result in a substantial cost to the bank in the terms of both
actual dollars and staffing.

USBNA has approximately $114 billion in domestic deposits. Our deposits are housed in
several traditional deposit applications, as well as non-traditional and non-deposit
applications. A preliminary analysis was completed for our main deposit applications.

The data requested in the survey could not be collected in a timely and accurate manner.
It would be burdensome to solicit the survey data from our non-traditional and non-
deposit taking applications. Gathering the information from our main deposit taking
application would require a labor-intensive manual process.

Goal 1 – Identification of Account Ownership
While most of this information would be available and may be of use to the FDIC, there
would be a labor intensive manual effort required to ensure the accuracy of any reporting
necessary for multiple owner accounts.

Goal 2 – FDIC Insurance Determination
Many of the unique identifiers requested in the survey are currently not available in the
main deposit applications. The non-traditional and non-deposit applications were not
addressed in the preliminary survey. However, the same issues regarding the unique
identifiers can be applied to these applications as well.

The collection of the data to identify the insurance categories for in excess of 10 million
existing accounts would be economically unfeasible. In addition this would likely be a
comprehensive manual task which would be time prohibitive.

Goal 3 – Hold Processing
Our primary deposit applications currently support the ability to place holds on accounts. However, this is not true for our non-traditional deposit applications.

Goal 4 – Processing Segmentation
Our primary deposit applications currently can provide the number of accounts. However, this would become a manual process for the non-traditional deposit applications.

Goal 5 – Miscellaneous Data Collection
Our systems would require additional programming time to allow us to identify this information on timely, forward looking basis. This would also require an extensive manual process to identify and accurately report the existing items.

System Development Costs
A conservative estimate of development/implementation costs to meet the system requirements for our primary deposit application system alone would be as follows:

> Goal 2 (FDIC Insurance Determination) – 8,000 hours for $360,000 (development and staffing)
> Goal 5 (Miscellaneous Data Collection) – 3,500 hours for an estimated $157,500 (development and staffing)

Implementation of any changes would not be initiated until a final notification is received. There would be an additional 9-12 month delay before programming changes could begin due to the development calendar and control processes for system changes. These changes would be required to facilitate the collection of the required data on a go forward basis. These estimates do not include the time and costs necessary to review and ensure accuracy of over 10 million accounts. The process to do so would require an exhaustive manual process and would be both time and cost prohibitive.

It should be noted that the "system development costs" are only one component of the cost to implement these changes. Of equal or greater concern are the costs associated with performing the "initial data clean up" at the account level, prior to inputting additional data elements and the incremental data entry costs associated with the additional data elements.

Based on a 10 million account portfolio and a mere three (3) minutes per account data clean up, the initial effort would exceed $22 million (10,000,000 accounts x 3 minutes @ $45 per hour).

Assuming a 10% account turnover ratio, the incremental annual data entry cost would be approximately $1.5 million (1,000,000 accounts x 3 minutes @ $30 per hour).

As these estimates indicate, system development costs are only a small portion of the total cost to implement these changes.

Sincerely,

/s/ Terry R. Dolan