

From: Bruce Mueller [mailto:bruce@sterlingbank.ws]
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Consider **eliminating** the proposed breakdown of “Other consumer loans” into automobile loans and all other consumer loans for schedules RC-K and RI and handle similarly to how banks currently disclose “Loans to finance agricultural production and other loans to farmers.” Such loans are disclosed as a **memorandum item** to those schedules requiring completion only by banks with \$300 million or more in total assets and banks less than \$300 million in assets if the category of loans exceeds 5% of total loans.

This would remain consistent with existing reporting methodology and reasoning for gathering such additional detail. Many smaller banks (individually or in aggregate) just don’t have a significant volume of automobile loans to be of material reporting consequence.

Sterling Bank is a \$176 million community bank with approximately \$118 million in loans of which only 84 loans totaling \$845 thousand (0.72%) would be classified as automobile loans.

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